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ABSTRACT

Although there are many reasons for why women are so scarce in top positions in education, including top positions in the Education Division of the Department of Health, Education, and Welfare, a primary one is sex discrimination in hiring and promotion. Women are discouraged, in the Education Division, and elsewhere in the profession, from training or applying for administrative positions and by an informal "buddy" system that operates among men in power and, in essence, excludes women. These are two conclusions reached by the National Advisory Council on Women's Educational Programs in its study of the Education Division of HEW. This publication describes the status of women in the Education Division, identifies barriers to their advancement, explores exemplary practices that foster the participation of women in management and policy development, and examines the Division's use of women as professional advisors. Each chapter concludes with a set of recommendations for improvement. Appendixes include statistical data on the number of women and kinds of positions they hold in various Division units. (Author)

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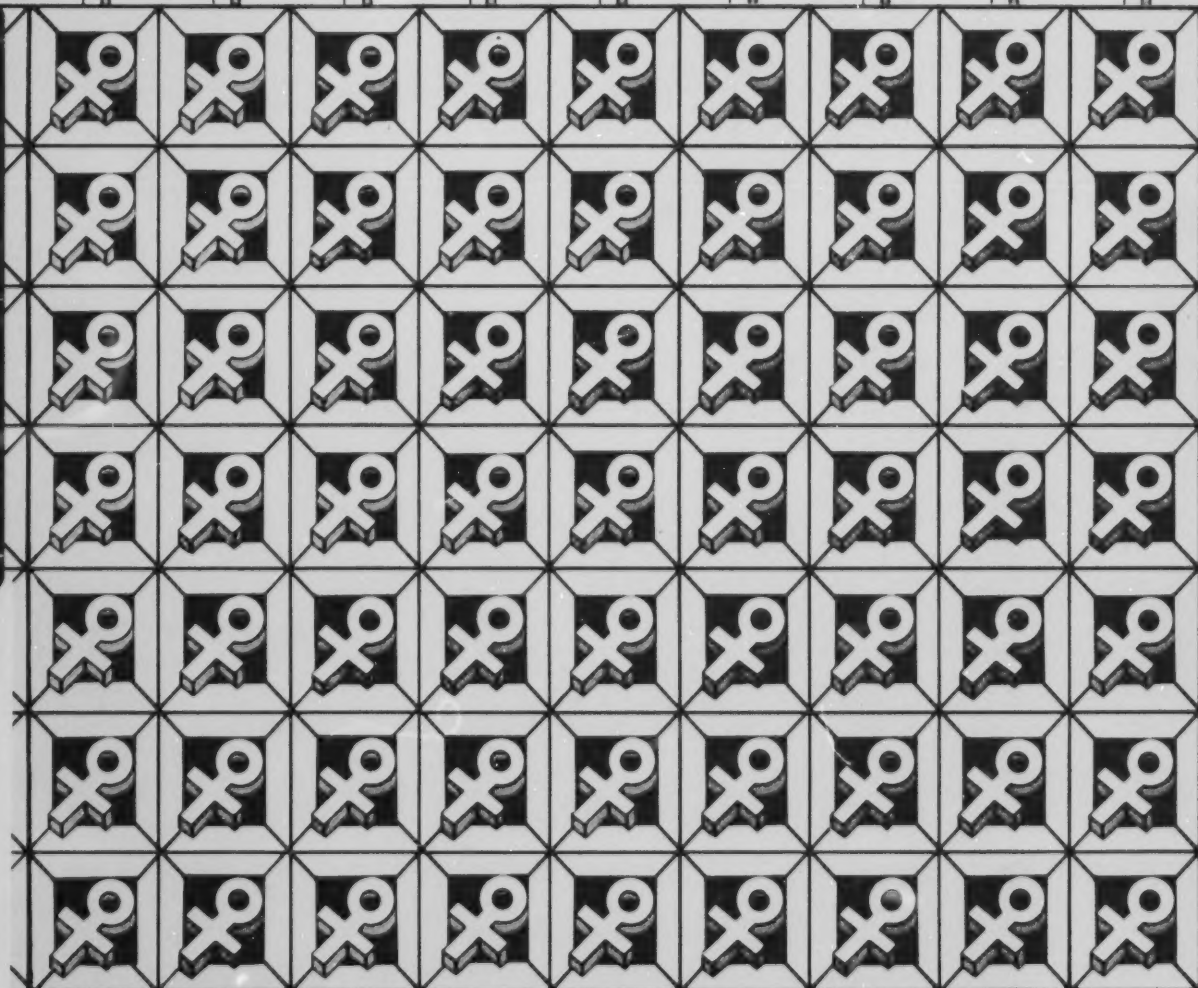
Women's participation in management and policy development in the education division

The National Advisory Council
on Women's Educational Programs



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**JoAnn Steiger
&
Eleanor S. Szanton**

**for
The National Advisory Council
on Women's Educational Programs**

Washington, D. C.

July 1977

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Preface

The National Advisory Council on Women's Educational Programs was created by law in 1974 to advise the Assistant Secretary for Education, the President, and the Congress on all Federal education programs as they affect girls and women. Responding to this mandate, the Council has commissioned five papers addressing the following questions: (1) To what extent do women participate in management and policy development in the Education Division?* (2) What efforts are made to assure sex fairness in the distribution and use of Federal funds? (3) What is the impact of Education Division programs on girls and women? (4) How sex fair are communications, products, and dissemination strategies? (5) What changes are needed in legislation, regulations, and enforcement to prevent sex discrimination and overcome sex bias and sex stereotyping?

These papers grew out of the Council's desire to follow up recommendations made in 1972 by an internal Office of Education Task Force. The Task Force report, *A Look at Women in Education: Issues and Answers for HEW*, documented discrimination against women throughout the nation's education system and made thirty-three recommendations for change in U.S. Office of Education practices. A follow-up report entitled *Challenging Sex Discrimination Through Organizational Reform* (1975), by Holly Knox and Mary Ann Millsap, two of the original Task Force members, found that little had been done to implement these recommendations. The Council wanted to know what has been done since.

It became clear that--because of internal reorganizations within the Education Division, changes in legislation, and changes in personnel--simply tracing the original recommendations would not give an accurate picture of either accomplishments or needs. Therefore, the concept of the review was expanded to include a general analysis of what efforts the Education Division has made to improve opportunities for girls and women** and of what obstacles to equality of the sexes remain. The 1972 report is the baseline against which progress is measured.

These reports aim to identify key problems, describe exemplary efforts to promote sex fairness, and recommend practical changes in Education Division policy and practice that would improve equity for women.

METHODOLOGY

The information for these papers was collected between August 1976 and February 1977. Three basic sources were used:

*The Education Division comprises the Office of Education, the National Institute of Education, the Fund for the Improvement of Postsecondary Education, the National Center for Education Statistics, the Office of the Assistant Secretary.

**The term women as used in these reports includes both minority and nonminority women. The Council is fully aware of, and deeply concerned about, the double burden of discrimination borne by minority women. Wherever possible, minority women are discussed as a special group.

1. INTERVIEWS. A team composed of a consultant and a member of the Council staff interviewed more than thirty top officials in the Education Division, including deputy commissioners, associate commissioners, and associate directors. In addition, women occupying high-level positions in the Division were interviewed.

2. GROUP MEETINGS AND QUESTIONNAIRES. Further information was gathered from major subdivisions* through group meetings with employees who volunteered or who were selected to help with the study by the person in charge of that unit. At the preliminary meeting with each group, questionnaires were distributed; follow-up meetings were held to discuss responses to the questionnaire.

3. ANALYSIS OF DOCUMENTS. Where they could shed light on the subject, documents such as affirmative action plans, grant guidelines, and products developed with Education Division funds were reviewed.

A draft report was written and circulated to all interested parties, including people who had participated in the information-gathering phase. The draft was revised to incorporate the suggestions of the reviewers where appropriate.

Although in some cases the information given to us by interviewees could be corroborated, in other cases limitations of time and funding prohibited a search for additional witnesses. Where appropriate, the sources of information are noted, but the names of some individuals giving information in the interviews have been withheld for their protection.

This report was written under contract with Steiger, Fink, and Kosecoff, Inc., of McLean, Virginia.

*Units that participated in the group meetings were:

The Bureau of Occupational and Adult Education
The Bureau of Elementary and Secondary Education
The Bureau of Education for the Handicapped
The Bureau of Postsecondary Education
The National Institute of Education
The Fund for the Improvement of Postsecondary Education.

In addition the Office of Education's Regional Offices responded to the questionnaires.

Executive Summary

Although women constitute the majority of professionals employed in education--in 1973-74 constituting 84 percent of the elementary school teachers and 47 percent of the secondary school teachers--they are underrepresented in management and policy-making positions at the institutional, local, and state levels. For example, in 1972-73, only 20 percent of the elementary school principals, 2.9 percent of the junior high school principals, 1.4 percent of the senior high school principals, and a mere 0.1 percent of the school superintendents were women. In 1976, only four of fifty chief state school officers were women. And, according to a 1977 survey, the membership of the American Association of School Administrators was 96.2 percent male and 94.7 percent white. (See Chapter I.)

The National Advisory Council on Women's Educational Programs, charged with advising the President and Congress on how Federal education programs affect girls and women, investigated the extent to which the employment practices of the Education Division of the Department of Health, Education, and Welfare reflected the same problems of sex bias and sex stereotyping as the education world at large, and to what extent the Division serves as a model of sex fairness. Information was collected through extensive interviews with Division officials and with female employees, group meetings with employees of major administrative subdivisions, questionnaires, and analyses of secondary data sources. (See Preface for a discussion of the methodology.)

The following report presents the findings of that investigation. Chapter II describes the status of women in the Educational Division; Chapter III identifies barriers to their advancement; Chapter IV examines exemplary practices that foster the participation of women in management and policy development; and Chapter V discusses the extent to which women are represented when the Division seeks external advice.

In summary, the study found that both nonminority and minority women are seriously underrepresented at the top levels of the Education Division. For example, as of December 1976, 84 percent of the employees at the GS-5* levels, but only 12 percent of those at the GS-15 level, were women. Minority women constituted 44 percent of the GS-5's but only 2 percent of the GS-15's.

Some progress has been made over the past few years, however, with respect to the representation of women at the top levels. In 1972 women constituted 17.9 percent of Education Division employees in grades GS-13 through GS-15; by 1976 their proportion had increased to 20.6 percent. Minority women constituted 4.6 percent of the employees at these levels in 1976, up from 2.7 percent in 1972.

*Most government employees are classified and paid according to a scale called the General Schedule (GS) that ranges from grades 1 through 18.

The data necessary for these analyses of employment patterns were difficult to obtain. The investigators found that the Education Division has no easily accessible data that are comprehensive, accurate, timely, comparable, and reported by sex and by race.

Having documented the basic employment patterns for women, the Council then sought to discover what factors explain them. Anecdotal evidence from Education Division officials and from women employees revealed a wide range of obstacles to the advancement of women: changes in the mission of the Office of Education, leading to a reduction in the number of high-level jobs; systemwide underutilization of personnel; sex bias and sex discrimination; a lack of clear performance standards; the requirement that preference be given to veterans of military service; irrelevant requirements for experience that tend to exclude women; and a variety of subtle factors that operate informally.

Special efforts to increase opportunities for women were reviewed. The study found that affirmative action plans are, by and large, regarded as "window dressing." No one is held accountable for implementing an affirmative action plan, and old plans are not even saved for reference. On the positive side, some units have attempted to make such plans more meaningful, some have made special efforts to recruit women for top jobs, and some have initiated activities to create bridge positions for internal advancement and to promote staff development. But progress has been both slow and uneven from office to office, the greatest impediment, according to respondents, being "lack of support from top officials."

The study also found that women are underrepresented on advisory councils and in other advice-giving roles at both the national and state levels. The single most powerful council--the National Council for Education Research, which has policy-making authority--includes only one woman member.

On the basis of these findings, the Council makes the following recommendations:

CHANGING THE PATTERNS OF EMPLOYMENT OF WOMEN (See page 3-6)

1. The Education Division should advance more women to management and policy-making positions.
2. The Education Division should promote the collection and dissemination of timely, detailed, and comparable data.

ELIMINATING OBSTACLES TO THE ADVANCEMENT OF WOMEN (see pp. 7-13)

3. The Education Division should take immediate steps to remedy the problem of underutilization.
4. Precise performance standards should be set for each job category, and employees should be evaluated in terms of how well they meet those objectives.
5. The Assistant Secretary of Education should recommend to the Civil Service Commission that the current system of giving preference to veterans be revised.

6. Present job requirements should be reviewed, and irrelevant job requirements (e.g., experience that may not be necessary for effective job performance, past salary) should be eliminated.
7. Education Division officials should be required to provide the same kinds of informal opportunities for advancement to their female employees as they do to their male employees.
8. The Education Division should provide programs to support the advancement of women.
9. In filling new or newly vacated positions, the Education Division should systematically solicit names of qualified women from women's groups.
10. The Education Division should continue to provide subsidized day care services for children of employees.
11. The Education Division should institute flexi-time arrangements.
12. The Education Division should study the options available for part-time work and should implement an improved and expanded program of part-time work opportunities.

INCREASING OPPORTUNITIES FOR WOMEN (See page 15-20)

13. Each unit in the Education Division should develop a specific and detailed affirmative action plan, committing the unit to make exhaustive searches for qualified women and to monitor progress.
14. Periodic performance reviews should be conducted on all personnel, including GS-15's, who are not now included. As part of the review, the contribution that the employee has made to the advancement of women and minorities should be assessed.
15. Affirmative action plans should include strategies to increase opportunities for women and minorities to engage in activities that will advance their careers.
16. A system of incentives should be designed and instituted to reward supervisors for meeting affirmative action goals.
17. Some clerical jobs should be restructured so as to create bridge jobs wherein a person can work part time as a secretary and part time in a professional capacity.
18. Jobs in the Education Division should be restructured to create slots for competent but inexperienced people to learn jobs.
19. Efforts should be made to change sex-biased attitudes.
20. The Division of Personnel and Training, with the assistance of the Federal Women's Program, should implement a comprehensive training program in problems of sex bias and sex stereotyping for all Office of Education staff.

INCREASING THE REPRESENTATION OF WOMEN ON ADVISORY GROUPS (See pp. 21-23)

21. We repeat the 1972 recommendation that the Education Division recommend to the President that all national advisory councils have a balanced membership reflecting the proportion of women in the general population (50 percent) and that the Education Division furnish lists of nominees appropriate to that goal.
22. Future vacancies on the National Council on Educational Research should be filled by women until they constitute half the members.
23. The Education Division should encourage state and local authorities to make appointments to advisory councils in such a way that the councils will be approximately half male and half female.
24. Contact with women's groups should be improved.
25. Sex fairness should be observed in appointing members of review committees.
26. Data on consultants by-sex-by-race, as well as information on pay rates and total earnings, should be readily available.

I.

Introduction

The employment practices of the Education Division (U.S. Department of Health, Education, and Welfare) are significant for two reasons. The first involves sheer numbers: The Division employs 4,000 people and administers \$8.2 billion a year in federal funds. Second, and even more important, the Division is highly visible to educators throughout the nation and thus sets an example for the profession.

It is appropriate, then, to ask what the Education Division has done to demonstrate its commitment to sex fairness, not only in hiring but also in career advancement. Without such a commitment, progress in eliminating sex bias from the field of education as a whole is likely to be impeded.

Like other professions, education is directed by white males. According to a 1977 survey, the membership of the American Association of School Administrators was 96.2 percent male and 94.7 percent white.¹ Unlike most other professions, however, the work force in education is predominantly female and has been for over a century. In 1870, three in five elementary school teachers were women.² The proportion, which peaked at 91 percent in 1950, was 84 percent in 1973-75, according to a survey by the National Center for Education Statistics (NCES).³

At each successive level of the hierarchy of prestige and salary, the proportion of women declines. Thus, in 1973-75, women constituted 47 percent of secondary school teachers. In 1972-73, 19.6 percent of elementary school principals, 1.4 percent of secondary school principals, and 0.1 percent of central office administrators and superintendents were women.⁴ At the postsecondary level, women constituted 24 percent of the faculty, but they were concentrated in the lower (untentured) ranks and at the less prestigious institutions.⁵

The same situation obtains with minority women*, who in 1970 constituted 6.5 percent of the population,⁶ 14 percent of the public school teachers,⁷ but only 2.5 percent of the school principals.

Why are women so scarce in top positions in education? The reasons are many and varied, a primary one being sex discrimination in hiring and promotion.⁹ Other reasons are that women are discouraged from training or applying for administrative positions and that an informal "buddy" system operates among men already in power and, in essence, excludes women.¹⁰

Sex discrimination in employment in education violates at least two federal laws: Title VII of the Civil Rights Act of 1964, which prohibits discrimination in all employment, and Title IX of the Education Amendments of 1972, which prohibits sex discrimination in all federally assisted education programs.

Despite these laws, HEW's Education Division has failed to set an example of sex-fair hiring and promotion practices. Instead, it suffers from some of the same biases as the rest of education and presents some of the same impediments to the advancement of women, who predominate in the lower ranks but are underrepresented in the upper ranks.

In the chapters that follow, the status of women in the Education Division is described, barriers to their advancement are identified, exemplary practices that

*The term women as used in this report includes both minority and non-minority women. The Council is fully aware of, and deeply concerned about, the double burden of discrimination borne by minority women. Wherever possible, minority women are discussed as a special subgroup.

foster the participation of women in management and policy development are explored, and the Division's use of women

as advisors is examined. Each chapter concludes with a set of recommendations for improvement.

II.

What is the pattern of employment for women in the education division?

Although three-fifths of all education professionals are women,¹¹ women constitute only 26.7 percent of those employed by the Education Division under "Education and Research Program," the most common job classification.¹² Looking at the distribution of women among Civil Service grade levels,* one finds that they are concentrated in the lower grades and relatively absent from the upper grades. For example, 84 percent of Education Division employees at GS-5 and 94 percent of the GS-6's-- but only 12 percent of the GS-15's and 14 percent of the GS-16's -- are women.

The pattern is similar for minority women, who constitute 44 percent of the GS-5s, 53 percent of the GS-6s but only 2 percent of the GS-15s and 3 percent of the GS-16s employed by the division.¹³ (Exhibit 1 shows the numbers and proportions of women at grades 13-18 in the Education Division; Exhibit 2 gives similar figures for minority women. **)

*Civil Service employees are classified and paid according to a scale called the General Schedule (GS) that ranges from grades 1 through 18. The upper grades start at GS-13. Supervisory responsibility starts at GS-14. Most people up through grade 15 are permanent employees whose job rights are protected by Civil Service regulations. Grades 16-18 are "supergrades;" many Education Division employees in these grades are political appointees who serve without Civil Service protection.

** Appendix A contains all exhibits: i.e., tables and figures.

In general, a high GS grade implies a position of high executive or professional responsibility, but such is not always the case. For example, one female GS-17 arrived in Washington to find that she had a total staff of four, virtually no program responsibility, and a very limited budget -- circumstances that put her at a serious disadvantage compared with her male colleagues.*

Though it does not tell the whole story, the Education Division's organization chart is another indicator of the status of women in the Division. Exhibit 3 is the November 1976 organization chart of the Office of Education,** the largest single component of the Education Division, accounting for over 3,000 of the Division's total of 4,000 employees. Of the ninety-three people: ten are women, of whom four are minority women.

DISTRIBUTION BY UNIT

To pinpoint more precisely the status of women in the Education Division, Exhibits 4-7 show the distribution of women at upper grade levels (GS-13 through GS-18) in selected subdivisions as of December 1976. Thus, the Fund for the Improvement of Postsecondary Education (FIPSE) -- a small unit with an annual budget of \$11

*Anecdotal material, as well as direct quotations, come from personal interviews or from group meetings.

**The reorganization announced on April 12, 1977, is included in the Appendix but not reflected in the body of the report.

million -- has the highest proportion of upper-level women, 33 percent (or two out of six, one at GS-13 and one, the head of the unit, at GS-16). Of the ten people at professional and managerial grade levels in the Office of Indian Education (OIE), three (30 percent) are women (one GS-13 and two GS-14s). The unit with the largest proportion of women at upper grade levels is the Bureau of Occupational and Adult Education (BOAE), with 27.5 percent (nineteen of sixty-nine, all in grades 13-15).

Ranking low with respect to the proportion of women in the upper grades are the Bureau of Education for the Handicapped (BEH), with 18.5 percent (ten of fifty-four, all in grades 13 and 14) and the Bureau of Postsecondary Education (BPE), with 18.6 percent (twenty-four of 129, twenty-two in grades 13-15).

As Exhibit 6 indicates, minority women are best represented in the Office of Indian Education (OIE), where they constitute 20 percent of upper level employees (two of ten, both GS-14). Minority women account for 6.5 percent of the upper-grade positions (ten of 155, all in grades 13-15) in the Bureau of Elementary and Secondary Education (BESE), and 5.4 percent (seven of 129, six in grades 13-15 and one GS-16) in the Bureau of Postsecondary Education (BPE). As of December 1976, several units -- the Fund for the Improvement of Postsecondary Education, the National Center for Education Statistics, and the Bureau of Occupational and Adult Education -- employed no minority women at upper grade levels, though BOAE has since hired one minority woman at GS-16.

DISTRIBUTION IN REGIONAL OFFICES

In recent years, the Office of Education's Regional Offices have become increasingly important as more program responsibility is delegated to them by headquarters. What is the status of women in these Regional Offices? Exhibit 8 shows that their record is somewhat poorer than that of OE headquarters. Of ten Regional Commissioners, one is a

woman. In the Regional Offices, only 9.2 percent of employees in grades GS-13 through GS-15 in 1976 were women, a decline from the 1973 figure of 10.5 percent; only 2.7 percent were minority women, a slight improvement over the 1973 figure of 2.4 percent. Comparable figures for OE headquarters in 1976 were 24.9 percent women and 6.4 percent minority women.¹⁴

PROGRESS SINCE 1972

Granted that women are underrepresented at the top levels in the Education Division, the question arises, has any progress been made in recent years? Exhibits 1 and 2 show a slow but steady increase in the number of women and of minority women in grades GS-13 through GS-18 since 1972, at which time they occupied 217, or 17.9 percent of the 1,210 positions at these levels: 18.5 percent (214 of 1,159) in grades 13-15 and 5.9 percent (three of fifty-one) in grades 16-18. In 1976, they occupied 245 of the 1,190 positions in the upper grades, raising their share to 20.6 percent: They constituted 20.8 percent (238 of 1,143) in grades 13-15 and 14.9 percent (seven of forty-seven) in grades 16-18.

Thus, the proportion of women in grades 13-15 increased only 2.3 percentage points from 1972 to 1976, whereas their proportion in their supergrades (16-18) increased 8 percentage points. The reasons for the greater percentage change in the supergrades are, first, that many appointees at this level serve without Civil Service protection, resulting in more rapid turnover and more opportunities for new hires, and second, that the total number of supergrades is so small that a few appointments can change the proportions dramatically. This second point is most clearly illustrated by the change at the GS-18 level. In 1972, there were no women among the five appointees -- 0 percent. By 1976, a woman had been named Director of the National Center for Education Statistics, raising the proportion to 25 percent -- one out of four appointees.

In 1972, minority women constituted 2.7 percent of Education Division employees in grades 13-18 (thirty-three of 1,210): 2.7 percent in grades 13-15 and 3.9 percent in grades 16-18. In 1976, minority women accounted for 4.6 percent of the higher grades (fifty-five of 1,190): 4.7 percent in grades 13-15 and 2.1 percent in grades 16-18. The decline in the proportion of minority women in the supergrades was caused by the reduction from two minority women in 1972 (one at GS-16 and one at GS-17) to one in 1976 (at GS-16).

COMPARING AVERAGE GRADE LEVELS

Another way to track progress in the employment of women is to compare the average grade levels of all women and of all men employed in the Education Division (Exhibits 9-11). This measure is not wholly satisfactory in that the average for women is lowered if an unusually large number of women are hired in lower grades as well as if relatively few women occupy upper grades. To complicate the comparison even further, the average grade level has been declining for both sexes in recent years, partly because of changes in the Division's mission. In 1972, the average grade for men in the Office of Education was 12.6, the average grade for women was 7.6, and the disparity between the two was 5.0; in 1976, the average grade for men was 11.9, the average for women was 7.4, and the disparity was 4.5. Thus, the decrease in the disparity is attributable not to an increase in the average grade for women but to a decrease in the average grade for men that was greater than the decrease in the average grade for women.

The disparity between the average grades of men and of women had widened among people employed in the National Institute of Education. As Exhibit 9 indicates, the average grade for men remained constant at 12.3 between 1972 and 1976, whereas the average grade for women dropped from 7.8 to 7.5; thus the disparity increased from 4.5 to 4.8.

LACK OF ADEQUATE DATA COLLECTION AND REPORTING

The statistics collected by the Education Division on the employment of women and minorities are not adequate for tracking progress either within the Division or in the field of education as a whole. For example, the National Center for Education Statistics annually conducts a survey of women in school administrative positions, but because the survey groups together superintendents and assistant superintendents, the number of women reported to be in high-level positions is inflated. The Education Division maintains no central source of timely, detailed, comparable data, by-sex-by-race, on its employees. The information reported in this section and shown in the exhibits was extremely difficult to collect, requiring repeated visits to many offices. (For a list of available data, see Appendix E).

CONCLUSIONS AND RECOMMENDATIONS

Although the proportion of women holding high-level positions in the Education Division has increased slightly since 1972, women are still underrepresented relative to their proportion in the education profession. The scarcity of women -- including minority women -- in management and policy-making positions is as evident in the Education Division as in the field of education as a whole. Moreover, data relevant to these concerns are not readily accessible. The Education Division must play a leadership role in implementing federal legislation prohibiting sex discrimination. Therefore the Council makes the following recommendations:

1. The Education Division should advance more women to management and policy-making positions.

a. The Division should alter its internal practices so as to foster the advancement of women within its own structure. Such changes should include the development of procedures to ensure outreach in recruiting as well as sex-

fair evaluation of qualifications in hiring, upgrading and promotion decisions. More specific recommendations are given in the following sections.

b. The Division should use its influence and authority to foster the advancement of women into management and policy-making positions in education at the state, local, and institutional levels.

2. The Education Division should promote the collection and dissemination of timely, detailed, and comparable data.

a. The National Center for Education Statistics survey of school administrators should separate the superintendent and assistant superintendent categories;

all data should be collected by-sex-by-race.

b. The Department of Health, Education, and Welfare should assign responsibility for collecting employment data to such an office and at such a level as to ensure that timely, accurate, comprehensive and comparable data will be readily accessible. Data should be collected by-race-by-sex, by age, and by length of employment for each job category and should be tabulated (1) by GS level, (2) by job series, (3) by GS level by subdivision (bureau or office, etc.), (4) by major subdivision by job title (e.g., Division Director, Branch Chief), (5) by veteran-nonveteran status, and (6) by educational attainment.

III.

What obstacles hinder the advancement of women to key management and policy-making positions?

The obstacles that stand in the way of women's advancing to management and policy-making positions in the Education Division can be categorized as follows: recent employment changes, underutilization, bias and discrimination, lack of performance standards, regulations giving preference to veterans, irrelevant requirements for experience, and subtle factors.

EMPLOYMENT CHANGES

In recent years, the mission of the Office of Education (OE) has changed in ways that make it difficult for women--or indeed for any new employee--to advance. As Deputy Commissioner Edwin York, head of the Office of Management, explained in an interview, discretionary programs (in which OE personnel exercise a great deal of decision-making power) have been replaced in large part by formula grant programs. Whereas OE once needed large numbers of education professionals, it now requires a few managers and a large number of clerks. Thus, the average grade level has been declining (Exhibit 12). For example, in 1976 OE employed 316 GS-4's (compared with 234 in 1974) and 349 GS-5's (compared with 289 two years earlier) but only 384 GS-14's (down from 430 in 1974) and 214 GS-15's (down from 247).

According to several ranking officials interviewed for this study, OE's reduced need for high-level professionals

has created a surplus of employees in grades GS-13 through GS-15. In such circumstances, Civil Service rules impose a kind of seniority system protecting the rights of long-term employees. Those whose former jobs were abolished or downgraded (i.e., reduced in rank) retain rights of their previous grade levels, becoming "mandatory placements"* who have first call on any job opening at their grade level for which they have the minimum requirements. As a residue from traditional hiring and promotion practices, most of these mandatory placements are white males.

Consequently, a woman--no matter how highly qualified--finds it very difficult to be hired or promoted to one of these slots. One official interviewed for the study said that he was aware of no opening in his bureau above the level of GS-13. Another said that he is reluctant to announce an opening above the GS-11 level for fear of having to fill it with a mandatory placement.

The National Institute of Education (NIE) has also faced problems of downgrading, though for different reasons. Created in 1972, NIE had "exempt" status and hired rapidly for positions that in many cases did not coincide precisely with existing Civil Service job descriptions. As a result, NIE often assigned

* Employees who have been on exchange assignments under the Interagency Personnel Act (IPA) also become mandatory placements upon their return.

a GS grade in excess of what government auditors subsequently decided a given position warranted. So widespread were these differences that at one point hiring and promotions were frozen, and the DHEW Office of Management took over control of all personnel action. NIE has since regained control, but in the meantime all its positions were audited and many have been downgraded.

OE is also undergoing a series of audits which, according to Deputy Commissioner for Management Edwin York and Director of Personnel and Training Lois Hartman, will over a three-year period cover every job in the agency. Already many jobs have been recommended for downgrading. No official data by sex were available at the time of this study, but a number of employees believe that these recommendations for downgrading affect women disproportionately.

Thus, women--traditionally excluded from top-level jobs-- are trying to move up just at a time when the agencies are cutting back on top-level staff and, in fact, have a surplus of people with first call on any openings that occur.

Nonetheless, some new opportunities do exist. In those cases where no mandatory placements with the necessary qualifications are available, new people may be hired. For example, the Office of Bilingual Education--a relatively recent addition with \$100 million in discretionary funds-- was at the time of the study trying to fill sixteen job openings, and the Bureau of Occupational and Adult Education has openings mandated by new legislation.

UNDERUTILIZATION

Another frequently cited problem that contributes to the problems of women in the Education Division is underutilization of employees, which relates in many ways to the events described in the preceding section. As professionals have been moved from one slot to another in accordance with changes in mission mandated by Congress or the President, many

have found themselves in jobs ill-suited to their talents. At the same time, many women have accepted posts at levels that they perceive as below their capabilities, in hopes of being able to demonstrate those capabilities and thus be moved up to higher levels. Often these hopes have been frustrated, either because there is simply no room at the higher levels or because their present jobs offer these women few opportunities to demonstrate their competence.

For example, one woman reported in an interview that a former superior asked to rate her qualifications for promotion, replied that he could not do so because he had never given her any assignments that would test her abilities. The reason he had not given her any such assignments, he said, was that she had been pregnant when she worked for him.

In a recent study conducted for the Commissioner of Education by a group of consultants,¹⁶ thirty OE staff members were interviewed about their perceptions of the various causes and manifestations of underutilization. Besides Civil Service requirements and changes in OE's mission, the following were identified:

- The depressed economy and the consequent oversupply of educators
- Problems in OE's formal organization
- Problems in OE's informal organizational mechanisms, including "old-boy networks" and race and sex discrimination.

BIAS AND DISCRIMINATION

One item on a survey questionnaire distributed for this study concerned obstacles to the advancement of women in the Education Division. Of the thirty-nine people responding to this item, seventeen checked "bias," twelve checked "discrimination," and sixteen checked "lack of support from top officials." Such views were not unanimous, to be sure. Two male respondents indicated that there were "no obstacles" to the advancement of women in the Division.

Nonetheless, charges of discrimination were raised in interviews and in group meetings. Some sample comments were:

The top-level people look down on women and blacks.

Some associate directors look on women's concerns as a joke.

For the type of organization this is, OE has a disgraceful record on women. Bias is still around, though there is less and less.

Verbal respect is paid to women's concerns, . . . but there is a disparity between rhetoric and behavior.

Several anecdotes, derived from the interviews, illustrate the ways in which such bias operates.

An outside consulting group, asked by one unit in the Education Division to conduct some preliminary training activities on sex bias and sex stereotyping, insisted on doing a preliminary survey of the unit to assess its needs and to design a program for change. After the review, the consulting group reported that sex and race bias were widespread and said that they could not proceed unless certain practices were changed. No changes were made, and the training never took place.

One woman branch chief, with the rank of GS-14, found that her program responsibilities had expanded to the point where she was supervising substantially more employees than the male branch chiefs in her unit, all of whom were GS-15's. She complained to the equal opportunity officer and, after several rounds of discussions eventually involving the Commissioner of Education, it was determined that she could not properly continue in her job as a GS-14 in such circumstances. The official solution: Her job was upgraded to the GS-15 level, and a man was appointed to fill it; she would continue in her GS-14 level, working as his deputy. Indignant, she protested further. Ultimately she received her promotion but only, she contends, after it appeared that her male colleagues would otherwise have to accept a reduction in grade.

A woman with the rank of GS-15, who held a position previously occupied by a male GS-17, asked for a promotion to GS-16. Department officials held a secret meeting--she could not discover who was on the panel--and her request was refused, though she was not told of this decision until more than a month after it was made.

LACK OF PERFORMANCE STANDARDS

To the extent that precise performance standards--based on observable and measurable behavior--exist, opportunities for bias in judgments of an employee's merit are reduced. The lack of such standards in the Education Division is a serious problem according to Lois Hartman, OE's Director of Personnel and Training, and one that she is now moving to solve. As part of a comprehensive management analysis of the Financial Division, a pilot program was initiated in 1977 to develop performance standards for branch chiefs. The branch chiefs and personnel office staff are, in turn, working with division staff to develop performance standards for all employees in the Division. The Personnel Office expected the pilot program to be completed by June 1977.

If performance standards can be developed for the entire Education Division, and if they are drafted so as to eliminate sex-role expectations, this effort may represent a major advance for women.

VETERANS' PREFERENCE

According to present Civil Service interpretations of Federal law, veterans of military service must be given preference in hiring. This so-called veterans' preference operates in two ways. First, all prospective employees are rated on a 100-point scale: 70 points cover basic qualifications, and the remaining 30 are discretionary, to be used for evidence of special merit. Of those 30, 5 points are reserved for veterans. Thus, if a veteran and a nonveteran are equally qualified, or if the nonveteran ranks 4 points ahead of the

veteran on basic qualifications, the veteran must be hired. Second, if a veteran is one of the "top three" candidates based on ratings, no one ranking lower than third on the list may be hired. Veterans also get special preference in times of layoffs. In a culture that traditionally has encouraged men to enlist in the military and, until recently at least, has discouraged women, veterans' preference functions as a form of discrimination against women.

The rationale for this preference is that veterans deserve a boost since they have sacrificed some years of career advancement for their country. In actuality, however, preference is given not just to draftees fresh from combat but also to men who last saw service in 1944 and have since built successful careers and to men who have retired, on substantial pensions, from a 20-year career in the military and have entered government service as a second job. Indeed, comments made in the interviews suggest that mature women, who must compete for jobs with veterans of World War II and the Korean War find veterans' preference a bigger problem than do younger women, who may be competing with Vietnam-era veterans. Of the older employees, almost all the men and none of the women are veterans; the same does not hold true among younger professionals.

OE officials gave similar accounts of how this preference operates to keep women out of high-level jobs, as the following anecdote shows. A post previously occupied by a woman became vacant, and word filtered down through the hierarchy that it would be good to find a woman to fill it. In reviewing the candidates, the panel found eight or nine highly qualified women out of a field of twenty. But none of the women was a veteran, and most of the competing men were. Thus, even though the women were equal to or better than the men on merit, the extra 5 points for a veteran guaranteed that the post would go to a man.

The Civil Service Commission is now reviewing its interpretation of the law to

check the possibility that it may have been overzealous in giving such marked preference to veterans.

IRRELEVANT REQUIREMENTS FOR EXPERIENCE

Many top-level positions in the Education Division have formal requirements for the kinds of administrative experience (e.g., superintendent of schools, director of a state education agency) that historically have been denied to women. According to comments made in the interviews by a number of Education Division officials, however, such experience is not always relevant to the jobs for which it is considered a prerequisite. For example:

In the selection of a program head there was too much emphasis on "management" experience. It is not needed, and it knocks out good women.

We recommend women, but when it comes off the Civil Service list, they are not there.

It could be that the usual steps are not relevant to the job. In OE, of all places, we should stress education rather than experience.

A related factor, emphasis on previous salary, also keeps women out of top-level jobs. Women who work as educators at the local level are frequently underpaid; then, because the Civil Service Commission evaluates them by their salaries, they are penalized again when they apply for Federal jobs. Agreeing that this is a problem for women, Lois Hartman, OE's Director of Personnel, cited one case in which her personal intervention was required to dissuade the Civil Service Commission from assigning a low GS rating to a top-flight professional who happened to have been teaching at a poor southern school where salaries were disproportionately low. In another reported case, a woman with excellent credentials--including the publication of books on topics related to the job for which she was being considered--was rejected by the Civil Service Commission purely on the grounds that she was making only \$9,000 a year.

Similar problems arise in trying to hire women as consultants. One official interviewed spoke of a case where she wanted to hire a woman who had impressive experience but who had worked as a volunteer; since government rules tie consultant pay to current salary, the official had a very hard time getting approval to pay the consultant a fee.

SUBTLE FACTORS

Although many elements in the Education Division's formal structure work against the advancement of women to management and policy-making positions, it is the informal structure that causes the greatest problems, according to many of the women interviewed.

Over and over again, women complained of the "buddy system" and the "closed clique" of male officials. One woman said that the executive officer in her unit "looks out" for the male employees in the unit--even to the point of covering up for them on occasion--but does not seem to do the same for the women. Others spoke of decisions made over lunch or after hours, when women are not present. This mechanism also operates when there are job openings: Officials relying in the "usual channels," instead of making a deliberate search, usually come up with their friends as candidates.

Related to the "buddy system" is the system of mentoring. Under this system, a male official will groom a younger man for his job, taking him to important meetings, sending him to out-of-town meetings, giving him opportunities to exercise authority and to act in the boss's stead, and otherwise affording him high visibility to other professionals. These informal but important avenues to career advancement are rarely open to women.

In the interviews, many women said that the "buddy system" and the mentoring relationship did not seem to operate among women in OE, though two women commented that an internal communications and support system seems to exist among some of the women professionals in NIE. Of course,

very few women in the Education Division have significant power, so opportunities for effective support of this nature are inherently limited. At times, however, some women have found it possible to be accepted by their male co-workers. One woman remarked, "If I become one of the guys I can get 100 percent more accomplished," but added that women must still work half again as hard as men at the same level to keep their jobs because they are generally excluded from the informal male support network. Some interviewees complained that, by contrast, women in high positions are not always helpful to other women and may occasionally even retard their progress. One woman, arguing that women's groups outside the Education Division should press harder to get women hired, said: "The women's groups just aren't as effective as the other interest groups in knowing when new openings are coming and getting the information on their candidates to the right people."

Another point that came up in interviews is that women are often naive about how the bureaucracy operates and thus make unnecessary mistakes; in addition, many of the behaviors to which women are socialized--passivity, desire to please, openness--are inappropriate and even self-defeating in an organizational context. Representative comments are as follows:

Women are afraid to ask for promotions.

Women sit and wait to be selected.

Women call bosses by their last names but permit their bosses to call them by their first names. Men in the same position will use first names both ways.

Women are not keyed into raising hell.

Finally, women are often at a disadvantage because of their child-rearing responsibilities. Many female employees in the Education Division are parents of young children, and quite a few are single parents. The president of the employees union, Barbara Kemp, expressed

her constituents' concern that day care services be expanded--or at least continued--and that some version of proposed "flexi-time" arrangements be adopted. Under flexi-time, employees would be able to choose what hours to arrive and leave, although they would work the same total number of hours as under conventional arrangements. Five different plans for more flexible time scheduling are now under consideration.

CONCLUSIONS AND RECOMMENDATIONS

Numerous obstacles stand in the way of the advancement of women within the Education Division. Some of these obstacles are related to the formal structure, such as irrelevant job requirements and preferences for veterans. Others involve attitudes and behavior, such as sex bias on the part of officials, a closed "buddy system," and lack of mentoring relationships for women. In light of these problems, the Council makes the following recommendations:

3. The Education Division should take immediate steps to remedy the problem of the underutilization of women. To accomplish this end, the Commissioner of Education should allocate substantial resources--both in money and in the time of top management--to reviewing the recommendations of the Commissioner's report on underutilization, selecting strategies to overcome the problem, and implementing the strategies. Each of these activities should be carried out within a specified time frame.
4. Precise performance standards should be set for each job category, and employees should be evaluated in terms of how well they meet those objectives.
 - a. Performance standards should be formulated so as to eliminate sex-role expectations from jobs.
 - b. Promotions should be based on an objective and equitable

system that rewards competence and accomplishment.

- c. The pilot project on performance standards now being conducted in the Financial Division of the Office of Education should be carefully evaluated, refined, and implemented throughout the Education Division as soon as possible.
5. The Assistant Secretary of Education should recommend to the Civil Service Commission that the current system of giving preference to veterans be revised. Such revision seems especially appropriate in light of the abolition of the draft. One or more of the following actions should be taken:
 - a. Eliminate the veterans' preference.
 - b. Allow a veterans' preference for only ten years following the initial three years of military service.
 - c. Eliminate the "top three" rule.
 - d. In rating prospective employees, assign 5 points out of 200--rather than 5 points out of 100--for veterans, thus diluting the effect of veterans' preference.
 - e. Increase the scope of other competitive qualifications by changing the rating scale so that 50 rather than 30 points are available for discretionary award.
 - f. Allow the veteran's preference to be counted toward only one hiring in an individual's life.
 - g. Allow the veterans' preference to be counted in only one Reduction in Force (lay-off) in an individual's life.
6. Present job requirements should be reviewed, and irrelevant job requirements (e.g., experience that may not be necessary for effective job performance, past salary) should be eliminated. The Educa-

tion Division should conduct a thoroughgoing review of the system now used to rate candidates for jobs at grades GS-13 and above to determine the degree of sex bias in existing criteria. Criteria which are found to exclude women disproportionately should be scrutinized for their actual predictive validity: that is, the extent to which people who meet these criteria are actually more successful in government jobs than are people who do not meet them. Those criteria which prove to have little or no predictive validity should be discarded. Such a change would bring the Education Division into line with Supreme Court decisions regarding the use of biased employment criteria by private firms: e.g., the landmark Griggs v. Duke Power Company decision (401 U.S. 424, 91 S. Ct. 849 (1971)), in which the Court found that a company was in violation of Title VII of the Civil Rights Act of 1964 if it used employment criteria which were biased against minorities and which were not related to job success.

7. Education Division officials should be required to provide the same kinds of informal opportunities for advancement to their female employees as they do to their male employees. Such a requirement means that officials must first be made conscious of the kinds of informal opportunities that may exist. In addition, incentives should be provided to reward supervisors for the successes of their female employees.

8. The Education Division should provide programs to support the advancement of women.

- a. New employees should participate in training programs that will acquaint them with both the formal and the informal opportunity structure. Emphasis should be given to patterns of effective behavior within the organization.
- b. The directors of Federal Women's Programs should be enabled to counsel new female employees and to organize monthly meetings for sharing information among women employees.
- c. Programs such as assertiveness training and training to eliminate self-defeating behavior should be provided to women employees.
- d. Women should be given equal opportunity to participate in executive training programs.

9. In filling new or newly vacated positions, the Education Division should systematically solicit names of qualified women from women's groups.

10. The Education Division should continue to provide subsidized day care services for the children of employees.

11. The Education Division should institute flexi-time arrangements.

12. The Education Division should study the options available for part-time work and should implement an improved and expanded program of part-time work opportunities.

IV.

What special efforts are being made to increase opportunities for women?

Various kinds of efforts and activities have been developed to counter the adverse effects of the obstacles discussed in the preceding section. They will be described here under the following headings: affirmative action plans, search efforts, bridges for internal advancement, and staff development.

AFFIRMATIVE ACTION PLANS

Each major unit in the Education Division is required to develop annually an affirmative action plan for women and minorities. In some units the planning process is extensive, and the resulting plan detailed. In others, plans are vague.

The Bureau of Occupational and Adult Education (BOAE) offers an example of comprehensive planning. Its Affirmative Action Committee--composed of seventeen members ranging in grade from GS-7 to GS-15 and representing each program and staff office in the Bureau--is responsible for drafting a plan to be reviewed by the Deputy Commissioner and top managers, revised, and adopted. Goals are set for each subunit, and individual supervisors and program managers are then held responsible for their implementation. The Bureau of Postsecondary Education (BPE) has a similarly comprehensive planning procedure.

The most recent affirmative action plans of the BOAE, BPE and Bureau of Elementary and Secondary Education (BESE) break down the bureaus into divisions and offices, analyze the representation of mi-

norities and women in each, and make recommendations for action. The BPE plan has a breakdown by job series as well. The BOAE plan urges division chiefs to make exhaustive efforts to recruit minorities and women.

The plans of other units do not approach this level of specificity. Moreover, no comprehensive affirmative action plan has been developed for the Office of Education since 1975. OE's 1976 plan was returned by DHEW officials as "unacceptable," and rather than revising it, OE staff began work on the Fiscal Year 1977-78 plan.

The OE plan for FY 1974-75 specified numerical goals: desired increases in the percentages of female employees at upper grade levels. Other plans were general, containing no detailed goals or timetables. The National Institute of Education's 1976 plan states: "Affirmative action in the area of employment--recruitment, promotion, and training--will necessarily be limited until the Institute has satisfied the requirement of the Civil Service Commission audit report." As mentioned previously, this report calls for the downgrading of many employees.¹⁷

Whatever their quality in the abstract, affirmative action plans often founder on two major problems: Top management are not committed to them, and their implementation is not monitored.

Many of the officials interviewed for this study said that, at a time of down-

grading and cutbacks, affirmative action plans are mere "window dressing." One Associate Commissioner called the plans "a farce" and explained: "I can state that all my new hires will be minorities and women and look great on paper. In fact, I don't expect to be making any new hires." Another official said that the plans "are not worth the paper they are written on."

No one, in fact, is held accountable for implementing an affirmative action plan. Old plans are not even saved for reference. One officer in the Federal Women's Program believed that old documents should be thrown out once they are updated; otherwise they may mistakenly be used as a basis for action. OE's Equal Opportunity Office does not keep copies of the plans of OE units.

According to the 1974 DHEW affirmative action plan, "a goal setting and tracking system is needed within DHEW" to report and monitor progress in affirmative action.¹⁸ This plan also stated that goals and progress should be reviewed by agency heads and regional directors, and significant objectives should be included in the Operational Planning System of agencies and regional offices. Such action has never been taken.

In its discussion of its previous plan, the 1977-78 BOAE plan states:

There was inadequate monitoring of the plan. Although approximately 800 hours were devoted to plan preparation, almost no time was devoted to monitoring--except the administration of the assessment instrument at the end of the year. . . . Orientation of managers to their responsibilities for EEO and Affirmative Action was inadequate. These two situations meant that many of the actions recommended under the '76 plan were not implemented and did not produce the intended results.¹⁹

Similarly, the 1977-78 plan of the Bureau of Education for the Handicapped states: "The supervisors did not fully adhere to the bureau's monitoring and evaluation activities. . . . There has not been a

system for internal program evaluation and periodic progress reports to the EEO Officer and the EEO Advisory Council."²⁰

SEARCH EFFORTS

The importance of active efforts on the part of officials to seek out qualified women is illustrated by the Office of Legislation, which was frequently mentioned in the interviews as a unit where women have been hired and promoted on an equal footing with men over the years. Assistant Commissioner Albert Alford, who heads the Office, says of his hiring policy: "I usually hire for entry-level positions, and I look for the brightest. It is easy to find good women." While conceding that women can more easily be found for staff positions than for line management positions--where women are at a disadvantage because of experience requirements, as discussed in the preceding chapter--Alford contends that "a talent search will yield qualified women."

Asked what kept women out of high positions, another Assistant Commissioner replied: "A conscious decision not to make a special effort, but rather just to go through normal channels." As we have seen, the "normal channels" are the networks of school superintendents, graduate school deans, officials of professional organizations, past members of federal panels and committees, and other visible and influential people, usually white males. Because women have been denied access to these positions, they are overlooked in the search for employees.

One unit that has made special effort to seek out women is the Bureau of Occupational and Adult Education. Under the leadership of William Pierce, now Executive Deputy Commissioner, BOAE identified and hired a nonminority woman at the GS-17 level and a minority woman at the GS-16 level. A number of women in top positions have also been able to recruit women for their staffs. Virginia Smith, former head of the Fund for the Improvement of Postsecondary Education had a staff that was 33 percent female. Rebecca Schergens, former Deputy Assistant

Secretary for Education (Policy Communications), reported that she made a special effort to develop her female staff members. Corrine Rieder, Director of the National Institute of Education's Education and Work Group, has a woman Assistant Director and substantial female representation on her staff.

BRIDGES FOR INTERNAL ADVANCEMENT

As noted earlier, women are overrepresented in the Education Division's lower grade levels, especially in clerical positions: In 1974, 99.2 percent of the employees classified under the job title "secretary" were women.²¹ Several officials reported that they made efforts to promote secretaries to professional positions, and a number of programs have been designed to help the secretary who wants to advance.

Some programs--such as STRIDE--gives employees the opportunity to get a college education. The trainee is not guaranteed a job at the end of the program, however, and at a time of cutbacks and downgrading, that situation constitutes a problem. Florence Perman, head of DHEW's Women's Program, believes that secretaries who want to make more money but are not interested in going to college can find opportunities within DHEW if they learn the system. She suggests, for example, lateral moves to an area of interest: "A secretary in the Budget Office who wants to go into PR (Public Relations) can transfer as a secretary to the Office of Public Affairs and gain experience." She suggests also that women look into DHEW jobs in the area of procurement, where one can reach fairly high grade levels without a college education.

Describing the Impact Aid program under his jurisdiction (wherein clerks learn a complicated series of tasks), Thomas Burns, Associate Commissioner for State and Local Education Programs, pointed out that a number of trainees have risen to high levels within that program on the basis of having developed specific skills unique to the program.

According to many officials, however, rigidities in Civil Service regulations make it extremely difficult to change a classification and promote a clerical employee to a professional slot. Moreover, some maintained that certain existing programs designed to advance clerical workers to professional jobs have not been carefully implemented. Women have been promoted without receiving the necessary training, leading to frustration for both the women and their bosses.

Women who want to move from mid-level to top-level jobs also need bridge opportunities. The Fund for the Improvement of Postsecondary Education has developed a technique for providing such opportunities: Administrative responsibilities are rotated among staff members so that each has a chance to learn a variety of management functions on a day-to-day basis. This procedure can serve as a substitute for the informal training opportunities that male assistants typically obtain through mentoring. Several interviewees suggested that the problem could be eased by the simple expedient of placing more women in "second-in-command" slots and even occasionally creating such a slot for the woman who shows management potential.

STAFF DEVELOPMENT

Opinions were varied as to the effectiveness of training programs for women in the Education Division. One official stated: "Women need an opportunity to develop like anyone else, not special training." Another countered: "Training is needed at all levels." At one group meeting, a number of participants agreed that mid-level women were not given enough training opportunities.

A recent study of staff development at supergrade levels (GS-16 and above)²² revealed that many women were not aware of training opportunities and did not understand the advantages of management training programs. One provocative finding from this study was that fourteen of the fifteen supergrade men interviewed saw themselves as managers first and

specialists second, whereas twenty-seven of the twenty-eight women interviewed regarded themselves as specialists. Commenting on this difference in self-perception, Florence Perman, Director of the DHEW Federal Women's Program, said that many women fail to take advantage of opportunities to gain new skills and make new contacts because their view of their roles is so limited.

Another aspect of training that affects opportunities for women is training about sex bias and sex stereotyping; such training should also aim at furthering knowledgeability about the provisions of anti-discrimination laws. Indeed, in 1972 the Commissioner's Task Force on the Impact of Office of Education Programs on Women recommended that employees be given extensive instruction regarding Title IX and related issues. Follow-up studies show that little such instruction was ever given. (See Appendix B.)

A 1976 survey questionnaire administered for the International Women's Year study asked Education Division officials what type of training was provided for their staff "to insure their awareness of unique characteristics which affect the delivery of services to women." Twenty-eight of the people who completed the questionnaire did not respond to the question; twenty reported no training; nineteen marked the item "not applicable." Of the fifteen who described programs that were conducted, over half belonged in one unit: the Bureau of Occupational and Adult Education.

The Office of Education's Women's Program Staff (WPS), which has responsibility for training, has been unable to fulfill this responsibility because of a lack of commitment and support from top OE management and a chronic shortage of personnel. Though the 1972 Task Force report had recommended a sizable staff, the program started with one professional and one secretary. With the advent of the Women's Educational Equity Act--a \$6 million discretionary grant program that the WPS administers--the staff increased considerably but is still too

small to handle the full work-load assigned to it. While confirming this fact, Edwin York, head of OE's Office of Management, added that most programs in OE are understaffed and the best management can do is to "spread the hurt as evenly as possible."

CONCLUSIONS AND RECOMMENDATIONS

Progress toward the goals of affirmative action can be made even during difficult times. Commitment is the key. Success in identifying, hiring, and promoting qualified women and minority people depends on a willingness to search, to restructure jobs, and to foster staff development. Those who choose not to do so will say that it cannot be done. But the evidence is clear that if the commitment is there, ways can be found. The greatest impediment to progress, according to participants in this study, is "lack of support from top officials." In light of these considerations, the Council makes the following recommendations:

13. Each unit in the Education Division should develop a specific and detailed affirmative action plan, committing the unit to make exhaustive searches for qualified women and to monitor progress. The plans of BESE, BOAE, and BPE may serve as models.
 - a. Affirmative action goals should be entered in the Operational Planning System. Accomplishment of these goals should be systematically monitored and should be linked to a reward system.
 - b. Each year's affirmative action plan should include an explicit review of the previous year's goals and a report on the progress made toward these goals.
14. Periodic performance reviews should be conducted on all personnel, including GS-15's, who are not now included. As part of the review, the contribution that the employee

has made to the advancement of women and minorities should be assessed.

15. Affirmative action plans should include strategies to increase opportunities for women and minorities to engage in activities that will advance their careers. Examples of such activities are heading task forces, taking training, serving in an "acting" capacity for supervisors, accompanying top-level officials to meetings, and otherwise achieving greater visibility. Affirmative action plans should also include strategies for preparing female employees to deal with the problems they will encounter in the pioneering role of being the first woman in a previously male job and for preparing co-workers to accept and assist the woman placed in a previously male job.
16. A system of incentives should be designed and instituted to reward supervisors for meeting affirmative action goals. Rewards should be given for the provision of growth opportunities, as well as new hires and promotions, and for the successful advancement of women and minority employees who leave an office for a higher-level job elsewhere. Incentives might include the following:
 - a. an opportunity to obtain a rating of "outstanding" for affirmative action work on one's performance appraisal, or
 - b. a formal award from the Department.
17. Some clerical jobs should be restructured so as to create bridge jobs wherein a person can work part-time as a secretary and part-time in a professional capacity.
18. Jobs in the Education Division should be restructured to create slots for competent but inexperienced people to learn top jobs.

These "second-in-command" positions should be regarded as opportunities for training and recruiting, not as dead-ends. A special effort should be made to place in these positions women who are competent but who lack the specific experience needed for the top jobs.

19. Efforts should be made to change sex-biased attitudes.
 - a. We repeat the 1972 recommendation that training on Title IX and on issues of sex bias be provided to all OE supervisory staff.
 - b. Top managers should be screened at the time of hiring for their attitude toward women. The Assistant Secretary for Education, the Commissioner of Education, and the Director of the National Institute of Education should create an atmosphere of positive support for efforts to overcome sex bias and sex stereotyping, making it clear to their subordinates that the Education Division gives high priority to this goal.
 - c. Job descriptions for all supervisory positions should contain a statement on social fairness indicating that the supervisor has an obligation to help overcome biases in education programs with respect to sex, race, ethnicity, religion, age, and handicapping condition. Supervisors should be explicitly instructed to concern themselves with bias in both spoken and written language (including that in internal documents) and in experience requirements and evaluations of employees.
20. The Division of Personnel and Training, with the assistance of the Federal Women's Program, should implement a comprehensive training program in problems of sex

· bias and sex stereotyping for all
Office of Education staff. The
Education Division should ensure

that sufficient power and resources
are available for accomplishing
this task.

V.

To what extent are women represented when the education division seeks external advice?

The Education Division regularly seeks advice from a variety of outside groups including national advisory councils, other external sources (formal and informal), state advisory councils, and local and institutional councils. This section examines the representation of women in these groups.

NATIONAL ADVISORY COUNCILS

In 1972 the Task Force recommended that the Education Division's twenty-one national advisory councils be 50 percent female, reflecting the sex distribution in the general population. In 1976 these councils had a total of 280 members; 102, or 36.4 percent, were women. Excluding the National Advisory Council on Women's Educational Programs (NACWEP)--85 percent of whose members are female--the national advisory councils had a total of 260 members of whom eighty-five, or 32.7 percent, were women. (For details, see Exhibit 16.) Besides NACWEP, only two national advisory councils fulfilled the Task Force recommendation: the National Advisory Council on the Education of Disadvantaged Children and the National Advisory Council on Bilingual Education. Both of these councils were 50 percent female in 1976, which represents a slight drop from 1975 in the representation of women. Two other councils whose membership was at least 50 percent female were recently disbanded.

The council with the lowest representation of women, 8.3 percent (one of twelve members) was also the single most power-

ful council: the National Institute of Education's National Council on Educational Research (NCER). Unlike the other councils, the NCER has policy-making authority.

Ten councils had between 20 percent and 30 percent women members, and five had between 31 percent and 49 percent, in 1976.

Education Division officials were quick to concede that women are not adequately represented on national advisory councils. They added, however, that program officials do no more than submit lists of suggested names; the final decisions on membership are made at the Department level or higher. According to one interviewee, when her office submitted to DHEW a list of candidates that was 60 percent female, they were told explicitly that no more than one-third of the names on such lists should be women. The final membership on that advisory council was exactly 33 percent female.

In addition to the problem of numbers, the attitudes and knowledgeability of women chosen to be advisory council members has become an issue, one which was aired at the Congressional hearings on sex bias in vocational education.²³ Moreover, reference to the issue is made in the provisions of the new vocational education law (Title II of the Education Amendments of 1976). According to those provisions, the National Advisory Council on Vocational Education (currently 28.6 percent female)

is henceforth required to have "appropriate representation of both sexes, racial and ethnic minorities" and to include in its membership

women with backgrounds and experiences in employment and training programs, who are knowledgeable with respect to problems of job discrimination in job training and in employment, including women who are members of minority groups and who have, in addition to such backgrounds and experiences, special knowledge of the problems of discrimination in job training and employment against women who are members of such groups.²⁴

Reviewing recent publications of the national advisory councils (not including those of the National Advisory Council on Women's Educational Programs), one finds that, of seventeen reports published in the last year, only six address women's concerns, and then only tangentially. Other reports simply ignore women as a group, whatever their stake in the problems being discussed. For example, a report of the Advisory Council on Developing Institutions discusses "equal access" as it relates to minorities and to low-income students but not as it relates to women. Similarly, a report of the National Advisory Council on Equality of Educational Opportunity expresses concern about closer ties with immigrants, refugees, and bilingual people, but nowhere does it deal with equal educational opportunity for women. The report of the Advisory Council on Financial Aid to Students does not address itself to the special problems of women who receive student aid. Nor does the National Advisory Council for Career Education recognize the thorny problem of training young women for a broad range of careers; of fourteen research papers commissioned by this council, none dealt with women.

OTHER EXTERNAL SOURCES OF ADVICE

The Education Division seeks external advice in other ways, both formal and

informal. Formal advice comes from consultants and from members of various review panels, such as those that advise on grant awards. Less formally, communications are maintained with various advocacy groups (e.g., the National Education Association, the Urban League) through mailings, briefings, and telephone conversations.

Attempts have been made to increase the representation of women and minorities on review panels. In the NIE, for example, all panels are reviewed for balance by the Federal Women's Program director. According to women in NIE, however, these panels and committees are still not 50 percent female (one recent group comprised four women and nine men). Moreover, the same few women seem to crop up on these committees over and over again.

The Education Division does not keep any record of consultants by sex.

Finally, no women's advocacy groups are included on the mailing list of OE's Office of External Relations. Most officials say they have little contact with such groups.

STATE ADVISORY COUNCILS

Several Office of Education programs for which the states have discretionary authority (i.e., those involving vocational education, adult education, and Title IV of the Elementary and Secondary Education Act) require state-level advisory councils.

According to statistics compiled by the National Advisory Council on Vocational Education, in FY 1977 the State Advisory Councils on Vocational Education had a total of 1,228 members, 247 (20.1 percent) of whom were women.²⁵ (For details, see Exhibit 17). The advisory councils of all states had at least one woman member. Overall, the proportion of women on these state councils has increased each year since 1974, when the membership was 13.7 percent female. For FY 1978 and beyond, the state councils must increase their female member-

ship to comply with provisions of the new Federal vocational education law; these provisions are essentially the same as those for the National Council, as described above.

Neither the National Advisory Council on Adult Education nor the Adult Education Division of the Bureau of Occupational and Adult Education has conducted a study of the membership of the State Advisory Councils on Adult Education. The ESEA Title IV State Advisory Councils have a total of 931 members, 386 (41.5 percent) of whom are women. (For details, see Exhibit 18.)

LOCAL AND INSTITUTIONAL COUNCILS

A number of Office of Education programs require that advisory councils be formed at the local level. The largest such program is Title I of the Elementary and Secondary Education Act, a program for disadvantaged children that requires every school to have an advisory council composed of parents. Officials report that such councils tend to be predominantly female.

CONCLUSIONS AND RECOMMENDATIONS

Women tend to be underrepresented in the various groups from which the Education Division seeks external advice. Despite a 1972 recommendation to increase the proportion of women on advisory councils to 50 percent, the current proportion is only 36 percent. The most powerful council, the National Council for Educational Research, has only one woman member.

Women's advocacy groups do not systematically communicate with the Education Division to the same extent as do other advocacy groups whose constituencies are affected by Education Division decisions.

In light of these findings, the council makes the following recommendations:

- 21.** We repeat the 1972 recommendation that the Education Division recom-

mend to the President that all national advisory councils have a balanced membership reflecting the proportion of women in the general population (50 percent) and that the Education Division furnish lists of nominees appropriate to that goal.

- 22.** Future vacancies on the National Council on Educational Research should be filled by women until they constitute half of the members.

- 23.** The Education Division should encourage state and local authorities to make appointments to advisory councils in such a way that the councils will be approximately half male and half female.

- 24.** Contact with women's groups should be improved.
a. Leading women's advocacy groups should be added to the mailing list of the Office of External Relations and to its list of groups to be kept closely informed.
b. All offices in the Education Division should consult regularly with women's groups.

- 25.** Sex fairness should be observed in appointing members of review committees.
a. There should be a goal of 50 percent female membership on review committees.
b. Serious efforts should be made to seek out a variety of qualified women to serve on these committees.
c. People serving on these committees should be experienced and knowledgeable concerning problems of sex bias and sex stereotyping in education and in the world of work

- 26.** Data on consultants by-sex-by-race, as well as information on pay rates and total earnings, should be readily available.

Footnotes

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- ¹Education Daily, Vol. 10, No. 42 (3 March 1977), p. 2.
 - ²Rudolph C. Blintz, "Women in the Professions, 1870-1970," *Monthly Labor Review*, Vol. 197, No. 5 (May 1974), p. 35.
 - ³Roslyn D. Kane, *Sex Discrimination in Academe: A Study of Employment Practices Affecting Professional Personnel* (Washington: National Center for Education Statistics, Education Division, Department of Health, Education, and Welfare, April 1976), p. II-19.
 - ⁴*Ibid.*, p. II-31.
 - ⁵*Ibid.*, p. III-41.
 - ⁶Bureau of the Census, U.S. Department of Commerce, *Statistical Abstract of the United States*, 1975.
 - ⁷Kane, *Sex Discrimination in Academe*, p. IV-2.
 - ⁸*Ibid.*, p. IV-16.
 - ⁹For a detailed description of some discriminatory practices, see Doris M. Timpano and Louise W. Knight, *Sex Discrimination in the Selection of School District Administrators: What Can Be Done?* (Washington: Education and Work Group, National Institute of Education, U.S. Department of Health, Education, and Welfare, December 1976).
 - ¹⁰Kane, *Sex Discrimination in Academe*, p. VI-9.
 - ¹¹*Ibid.*, p. V-1.
 - ¹²U.S. Civil Service Commission, *All Agency Summary: Percent Women, Minority, Black and Hispanic of All Full-time Permanent Federal Government Employees*, November 1974.
 - ¹³DHEW-EEO figures for fall 1976.
 - ¹⁴1976 data assembled from 31 December 1976 report of Data Management Center, Computer Operations Division, Washington, D.C., and made available by HEW's EEO-FWP office, February 1977. No page numbers available. 1973 figures from Office of Education, Federal Women's Program.
 - ¹⁵HEW Federal Women's Program compilation for September 1974 and September 1976.
 - ¹⁶Office of the Commissioner of Education, *Report on Underutilization* (Unpublished MS, January 1977).
 - ¹⁷National Institute of Education, *Affirmative Action Plan*, 1976.

- ¹⁸Data from 31 December 1976 report of Data Management Center, Computer Operations Division, Washington, D.C., and made available by HEW's EEO-FWP office, February 1977. No page numbers available.
- ¹⁹Bureau of Occupational and Adult Education, *Affirmative Action Plan: October 1976-September 1978*, December 1976, p. 20.
- ²⁰Data from 31 December 1976 report of Data Management Center, Computer Operations Division, Washington, D.C. No page numbers available.
- ²¹U.S. Civil Service Commission, *All Agency Summary*.
- ²²Jinx Melia Associates, *Analysis of Supergrade Women in Prestigious Training Programs* (Washington: Secretary's Advisory Committee of The Rights and Responsibilities of Women, Department of Health, Education, and Welfare, January, 1977).
- ²³U.S. House of Representatives, Committee on Education and Labor, *Sex Discrimination and Sex Stereotyping in Vocational Education* (Hearings Before the Subcommittee on Elementary, Secondary, and Vocational Education, March 17 and April 21, 28, 1975), p. 49.
- ²⁴PL 94-482, Sec. 162a.
- ²⁵National Advisory Council on Vocational Education, *Summary Report, State*

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Appendix A

EXHIBIT 1

COMPARISON OF WOMEN IN HIGH GRADES IN THE EDUCATION DIVISION OVER TIME -- NUMBER AND PERCENTAGE OF WOMEN

	1972 ^a			1974 ^b			1976 ^c		
	# Women	Total ^d	% Women ^e	# Women	Total	% Women	# Women	Total	% Women
GS-13	110	410	26.8	117	415	28.2	121	422	28.7
GS-14	82	475	17.3	81	467	17.3	85	456	18.6
GS-15	22	274	8.0	28	293	9.6	32	265	12.1
Subtotal GS 13-15	214	1159	18.5	226	1175	19.2	238	1143	20.8
GS-16	1	33	3.0	3	24	12.5	4	29	13.8
GS-17	2	13	15.4	2	13	15.4	2	14	14.3
GS-18	0	5	0	0	4	0	1	4	25.0
Total GS 16-18	3	51	5.9	5	41	12.2	7	47	14.9
Subtotal GS 16-18	217	1210	17.9	231	1216	19.0	245	1190	20.6

^aSince there was no "Education Division" in 1972, this column includes OE and NIE (which, at that time, was included in OE). Figures compiled by HEW EEO/FWP office on basis of September 1972 computer run. Data supplied by HEW EEO/FWP office February 1977.

^bIbid., September 1974.

^cData for this chart were assembled from 31 December, 1976 report of Data Management Center, Computer Operations Division, Washington, D.C. and made available by HEW's EEO/FWP office, February 1977. No page numbers available.

^d"Total" = All men and women at that grade level.

^e"% Women" = % of total men and women at that grade level.

EXHIBIT 2

COMPARISON OF WOMEN IN HIGH GRADES IN THE EDUCATION DIVISION OVER TIME --
NUMBER AND PERCENTAGE OF MINORITY WOMEN

	1972 ^a			1974 ^b			1976 ^c		
	# Min F	Total ^d	% Min F ^e	# Min F	Total	% Min F	# Min F	Total	% Min F
GS-13	15	410	3.7	21	415	5.1	29	422	6.9
GS-14	11	475	2.3	15	467	3.2	20	456	4.4
GS-15	5	274	1.8	7	293	2.4	5	265	1.9
Subtotal									
GS 13-15	31	1159	2.7	43	1175	3.7	54	1143	4.7
GS-16	1	33	3.0	2	24	8.3	1	29	3.4
GS-17	1	13	7.7	0	13	0	0	14	0
GS-18	0	5	0	0	4	0	0	4	0
Subtotal									
GS 16-18	2	51	3.9	2	41	4.9	1	47	2.1
Total									
GS 13-18	33	1210	2.7	45	1216	3.7	55	1190	4.6

^aSince there was no "Education Division" in 1972, this column includes OE and NIE (which, at that time, was included in OE). Figures compiled by HEW EEO/FPW office on basis of September 1972 computer run. Data supplied by HEW EEO/FPW office, February 1977.

^bIbid., September 1974.

^cData for this chart were assembled from the 31 December, 1976 report of Data Management Center, Computer Operations Division, Washington, D.C. and made available by HEW's EEO/FPW office, February 1977. No page numbers available.

^d"Total" = All men and women at that grade level.

^e"% Women" = % of total men and women at that grade level.

EXHIBIT 3
OE: PAST ORGANIZATION

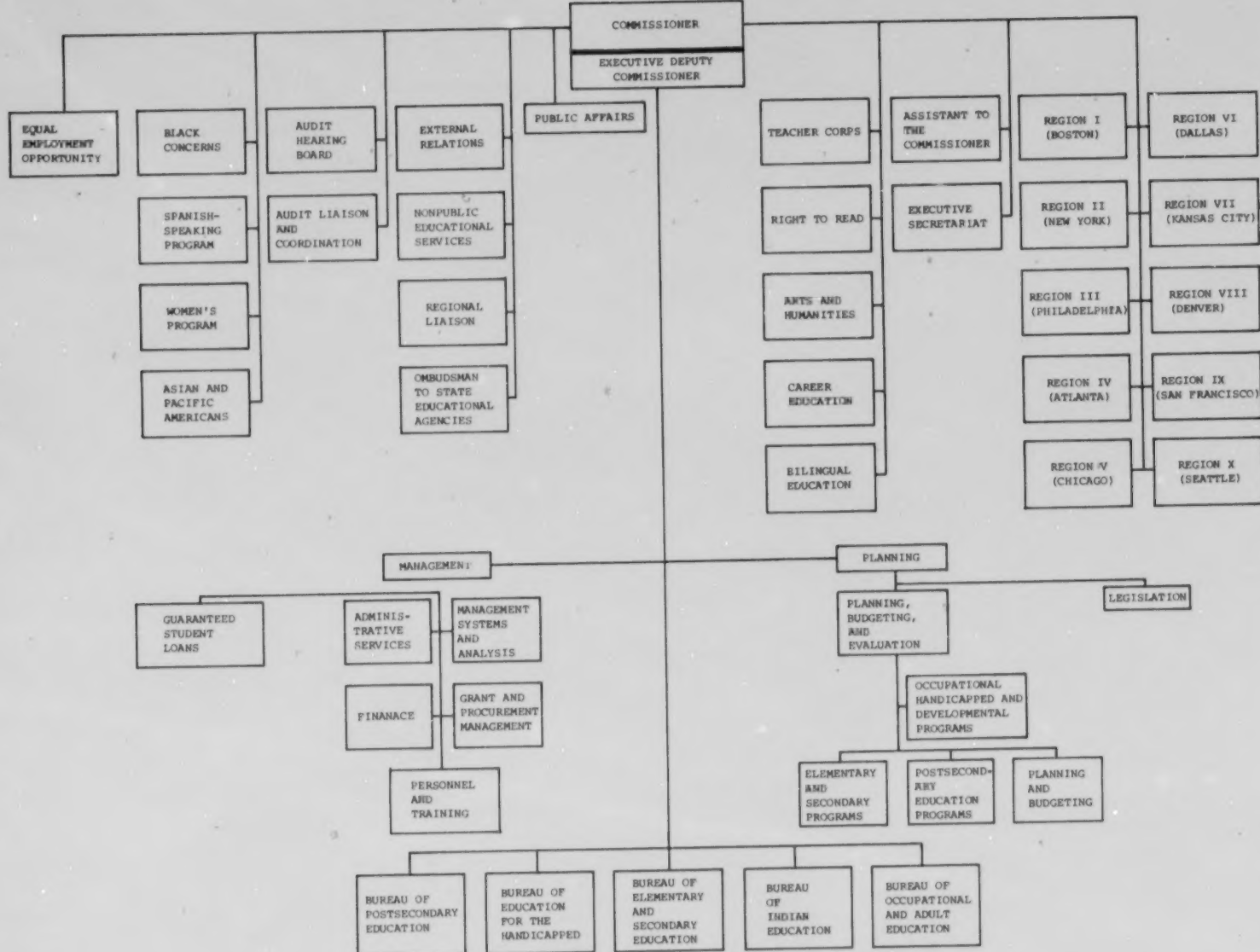


EXHIBIT 4

NUMBER AND PERCENTAGE OF WOMEN IN HIGH GRADES IN THE EDUCATION DIVISION AND SOME OF ITS MAJOR COMPONENTS (1976)^a

	Total Education Division			OE Regions & Hq.			OE Headquarters		
	# Women	Total ^b	% Women ^c	# Women	Total	% Women	# Women	Total	% Women
GS-13	121	422	28.7	104	368	28.3	89	247	36.0
GS-14	85	456	18.6	71	384	18.5	62	296	20.9
GS-15	32	265	12.1	25	214	11.7	25	163	15.3
GS-16	4	29	13.8	3	27	11.1	2	25	8.0
GS-17	2	14	14.3	2	14	14.3	2	14	14.3
GS-18	1	4	25.0	0	1	0	0	1	0
Total									
GS 13-18	245	1190	20.6	205	1008	20.3	180	746	24.1

^aMost of the data for this chart were assembled from the 31 December, 1976 report of Data Management Center, Computer Operations Division, Washington, D.C. and made available by HEW's EEO and FWP office. Data on NCES and FIPSE were gathered from NCES and FIPSE Administrative Offices.

^b"Total" = All men and women at that grade level.

^c"% Women" = % of total men and women at that grade level.

NOTE: "--" indicates no men or women at this grade level.

EXHIBIT 4 (cont.)

	OE Regions			A S E			N I E		
	# Women	Total	% Women	# Women	Total	% Women	# Women	Total	% Women
GS-13	15	121	12.4	12	32	37.5	5	22	22.7
GS-14	9	88	10.2	6	34	17.6	8	38	21.1
GS-15	0	51	0	3	29	10.3	4	22	18.2
GS-16	1	2	50.0	1	2	50.0	--	--	--
GS-17	--	--	--	--	--	--	--	--	--
GS-18	--	--	--	1	2	50.0	0	1	0
Total									
GS 13-18	25	262	9.5	23	99	23.2	17	83	20.5

EXHIBIT 4 (cont.)

	F I P S E			N C E S		
	# Women	Total	% Women	# Women	Total	% Women
GS-13	1	2	50.0	6	22	27.3
GS-14	0	1	0	6	31	19.4
GS-15	0	2	0	2	19	10.5
GS-16	1	1	100.0	--	--	--
GS-17	--	--	--	--	--	--
GS-18	--	--	--	1	1	100.0
Total						
GS 13-18	2	6	33.3	15	73	20.5

EXHIBIT 5

NUMBER AND PERCENT OF WOMEN IN HIGH GRADES IN THE
MAJOR BUREAUS OF THE OFFICE OF EDUCATION (1976)

	Bureau of Elementary & Secondary Education BESE ^a			Bureau of Occupational and Adult Education BOAE ^b			Bureau of Post- Secondary Education BPE ^c			Bureau of Education for the Handicapped BEH ^d			Office of Indian Education OIE ^e			Office of Planning		
	#F	Total	%F	#F	Total	%F	#F	Total	%F	#F	Total	%F	#F	Total	%F	#F	Total	%F
GS-13	21	40	52.5	8	15	53.3	13	38	34.2	5	19	26.3	1	1	100	8	15	53.3
GS-14	12	65	18.5	9	30	33.6	7	58	12.1	5	23	21.7	2	6	33.3	2	14	14.3
GS-15	8	44	18.2	2	19	10.5	2	24	8.3	0	7	0	0	3	0	2	13	15.4
GS-16	0	1	0	0	3	0	1	5	20.0	0	4	0	-	-	-	0	2	0
GS-17	0	4	0	0	1	0	1	4	25.0	0	1	0	-	-	-	0	1	0
GS-18	0	1	0	0	1	0	-	-	-	-	-	-	-	-	-	-	-	-
Total																		
13-18	41	155	26.5	19	69	27.5	24	129	18.6	10	54	18.5	3	10	30.0	12	45	26.7

^aData supplied by BESE, January 1977.

^bData supplied by BOAE in its Affirmative Action Plan, dated December 7, 1976, p. 61. Since that time, the Bureau has appointed a minority woman.

^cAs of June 30, 1976, according to data submitted to OE-EEO Office, fall 1976, with BPE 1977-78 Affirmative Action Plan. Data supplied by OE-EEO Office February 1977.

^dAs of June 29, 1976, according to data submitted to OE-EEO Office, fall 1976, with BEH 1977-78 Affirmative Action Plan. Data supplied by OE-EEO Office February 1977.

^eAs of June 29, 1976, according to data submitted to OE-EEO Office, fall 1976, with Office of Indian Education Affirmative Action Plan. Data supplied by OE-EEO Office February 1977.

^fAs of June 30, 1976, according to data submitted to OE-EEO Office, fall 1976, with Office of Planning Affirmative Action Plan. Data supplied by OE-EEO Office February 1977. Though not one of the major bureaus, it is included for further information.

EXHIBIT 6

NUMBER AND PERCENTAGE OF MINORITY WOMEN IN HIGH GRADES IN THE EDUCATION DIVISION AND SOME OF ITS MAJOR COMPONENTS (1976)^a

	Total Education Division			OE Regions & Hq.			OE Headquarters		
	# Min F	Total ^b	% Min F ^c	# Min F	Total	% Min F	# Min F	Total	% Min F
GS-13	29	422	6.9	29	368	7.9	26	247	10.5
GS-14	20	456	4.4	19	384	4.9	15	296	5.1
GS-15	5	265	1.9	4	214	1.9	4	163	2.5
GS-16	1	29	3.4	1	27	3.7	1	25	4.0
GS-17	0	14	0	0	14	0	0	14	0
GS-18	0	4	0	0	1	0	0	1	0
Total									
GS 13-18	55	1190	4.6	53	1008	5.3	46	746	6.2

^aMost of the data for this chart were assembled from the 31 December, 1976 report of Data and Management Center, Computer Operations Division, Washington, D.C. and made available by HEW's EEO and FWP office. Data on NCES and FIPSE were gathered from NCES and FIPSE Administrative Offices.

^b"Total" = All men and women of all ethnicities at that grade level.

^c"% Min F" = % of total described in b above.

NOTE: "--" indicates no men or women at this grade level.

EXHIBIT 6 (cont.)

	OE Regions			A S E			N I E		
	# Min F	Total	% Min F	# Min F	Total	% Min F	# Min F	Total	% Min F
GS-13	3	121	2.5	0	32	0	0	22	0
GS-14	4	88	4.5	0	34	0	1	38	2.6
GS-15	0	51	0	0	29	0	1	22	4.5
GS-16	0	2	0	0	2	0	--	--	--
GS-17	--	--	--	--	--	--	--	--	--
GS-18	--	--	--	0	2	0	0	1	0
Total									
GS 13-18	7	262	2.7	0	99	0	2	83	2.4

EXHIBIT 6 (cont.)

	F I P S E			N C E S		
	# Min F	Total	% Min F	# Min F	Total	% Min F
GS-13	0	2	0	0	22	0
GS-14	0	1	0	0	31	0
GS-15	0	2	0	0	19	0
GS-16	0	1	0	--	--	--
GS-17	--	--	--	--	--	--
GS-18	--	--	--	0	1	0
Total						
GS 13-18	0	6	0	0	73	0

EXHIBIT 7

NUMBER AND PERCENTAGE OF MINORITY WOMEN IN HIGH GRADES
IN THE MAJOR BUREAUS OF THE OFFICE OF EDUCATION (1976)

	Bureau of Elementary & Secondary Education			Bureau of Occupational and Adult Education			Bureau of Post- Secondary Education			Bureau of Education for the Handicapped			Office of Indian Education			Office of Planning		
	BESE ^a			BOAE ^b			BPE ^c			BEH ^d			OIE ^e					
	#MF	Total	%MF	#MF	Total	%MF	#MF	Total	%MF	#MF	Total	%MF	#MF	Total	%MF	#MF	Total	%MF
GS-13	2	40	5.0	0	15	0	4	38	10.5	1	19	5.3	0	1	0	0	15	0
GS-14	6	65	9.2	0	30	0	0	58	0	1	23	4.3	2	6	33.3	0	14	0
GS-15	2	44	4.5	0	19	0	2	24	8.3	0	7	0	0	3	0	0	13	0
GS-16	0	1	0	0	3	0	1	5	20.0	0	4	0	-	-	-	0	2	0
GS-17	0	4	0	0	1	0	0	4	0	0	1	0	-	-	-	0	1	0
GS-18	0	1	0	0	1	0	-	-	-	-	-	-	-	-	-	-	-	-
Total																		
GS-13-18 10	155	6.5	0	69	0	7	129	5.4	2	54	3.7	2	10	20.0	0	45	0	

^aBureau of School Systems (now Elementary and Secondary Education) Affirmative Action Plan Fiscal Year 1977, July 1976, p.12.

^bData supplied by BOAE in its Affirmative Action Plan, dated December 7, 1976, p. 61. Since that time, the Bureau has appointed a minority woman.

^cAs of June 30, 1976, according to data submitted to OE-EEO Office, fall 1976, with BPE Affirmative Action Plan. Data supplied by OE-EEO Office February 1977.

^dAs of June 29, 1976, according to data submitted to OE-EEO Office, fall 1976, with BEH 1977-78 Affirmative Action Plan. Data supplied by OE-EEO Office February 1977.

^eAs of June 29, 1976, according to data submitted to OE-EEO Office, fall 1976, with Office of Indian Education Affirmative Action Plan. Data supplied by OE-EEO Office February 1977.

^fAs of June 30, 1976, according to data submitted to OE-EEO Office, fall 1976 with Office of Planning Affirmative Action Plan. Data supplied by OE-EEO Office February 1977. Though not one of the major bureaus, it is included for further information.

EXHIBIT 8

NUMBER AND PERCENTAGE OF WOMEN IN HIGH GRADES IN REGIONAL
OFFICES OF THE U.S. OFFICE OF EDUCATION - MAY 1973 AND DECEMBER 1976

	Region I (Boston)			Region II (N. Y.)			Region III (Philadelphia)			Region IV (Atlanta)		
ALL WOMEN --May 1973 ^a	# F	Total	% F	# F	Total	% F	# F	Total	% F	# F	Total	% F
GS-13	0	8	0	3	10	33.3	1	12	8.3	4	27	14.8
GS-14	1	7	14.3	2	9	22.2	1	7	14.3	1	11	9.1
GS-15	0	5	0	0	4	0	0	7	0	0	4	0
Total	1	20	5.0	5	23	21.7	2	26	7.7	5	42	11.9

MINORITY WOMEN --May 1973 ^b	#MF	Total	%MF	#MF	Total	%MF	#MF	Total	%MF	#MF	Total	%MF
GS-13	0	8	0	0	10	0	0	12	0	1	27	3.7
GS-14	0	7	0	1	9	11.1	0	7	0	0	11	0
GS-15	0	5	0	0	4	0	0	7	0	0	4	0
Total	0	20	0	1	23	4.3	0	26	0	1	42	2.4

ALL WOMEN -- December 1976 ^c	# F	Total	% F	# F	Total	% F	# F	Total	% F	# F	Total	% F
GS-13	1	10	10.0	1	8	12.5	1	8	12.5	2	24	16.7
GS-14	1	9	11.1	2	6	33.3	0	6	0	4	14	14.3
GS-15	0	3	0	0	4	0	0	7	0	0	5	0
Total	2	22	9.1	3	18	16.7	1	21	4.8	6	43	14.0

MINORITY WOMEN -- December 1976 ^d	#MF	Total	%MF	#MF	Total	%MF	#MF	Total	%MF	#MF	Total	%MF
GS-13	1	10	10.0	1	8	12.5	1	8	12.5	0	24	0
GS-14	0	9	0	1	6	16.7	0	6	0	1	14	7.1
GS-15	0	3	0	0	4	0	0	7	0	0	5	0
Total	1	22	4.5	2	18	11.1	1	21	4.8	1	43	2.3

EXHIBIT 8 (cont.)

	Region V (Chicago)			Region VI (Dallas)			Region VII (Kansas City)			Region VIII (Denver)		
ALL WOMEN -- May 1973 ^a	# F	Total	% F	# F	Total	% F	# F	Total	% F	# F	Total	% F
GS-13	2	16	12.5	2	26	7.7	0	11	0	2	9	22.2
GS-14	1	9	11.1	0	11	0	0	11	0	0	10	0
GS-15	1	4	25.0	0	7	0	0	4	0	0	4	0
Total	4	29	13.8	2	44	4.5	0	26	0	2	23	8.7

MINORITY WOMEN -- May 1973^b

	#MF	Total	%MF	#MF	Total	%MF	#MF	Total	%MF	#MF	Total	%MF
GS-13	1	16	6.3	0	26	0	0	11	0	0	9	0
GS-14	0	9	0	0	11	0	0	11	0	0	10	0
GS-15	0	4	0	0	7	0	0	4	0	0	4	0
Total	1	29	3.4	0	44	0	0	26	0	0	23	0

ALL WOMEN -- December 1976^c

	# F	Total	% F	# F	Total	% F	# F	Total	% F	# F	Total	% F
GS-13	2	13	15.4	1	21	4.8	0	8	0	1	7	14.3
GS-14	1	14	7.1	1	11	9.1	0	8	0	0	8	0
GS-15	0	3	0	0	6	0	0	5	0	0	5	0
Total	3	30	10.1	2	38	5.3	0	21	0	1	20	5.0

MINORITY WOMEN -- December 1976^d

	#MF	Total	%MF	#MF	Total	%MF	#MF	Total	%MF	#MF	Total	%MF
GS-13	0	13	0	0	21	0	0	8	0	0	7	0
GS-14	0	14	0	0	11	0	0	8	0	0	8	0
GS-15	0	3	0	0	6	0	0	5	0	0	5	0
Total	0	30	0	0	38	0	0	21	0	0	20	0

EXHIBIT 8 (cont.)

	Region IX (San Francisco)			Region X (Seattle)		
ALL WOMEN --May 1973 ^a						
	# F	Total	% F	# F	Total	% F
GS-13	3	16	18.8	2	8	25.0
GS-14	3	11	27.3	1	7	14.3
GS-15	0	6	0	0	6	0
Total	6	33	18.2	3	21	14.3

MINORITY WOMEN --May 1973 ^b						
	#MF	Total	%MF	#MF	Total	%MF
GS-13	1	16	6.3	1	8	12.5
GS-14	2	11	18.2	0	7	0
GS-15	0	6	0	0	6	0
Total	3	33	9.1	1	21	4.8

ALL WOMEN -- December 1976 ^c						
	# F	Total	% F	# F	Total	% F
GS-13	3	11	27.3	1	11	9.1
GS-14	2	12	16.7	0	0	0
GS-15	0	8	0	0	5	0
Total	5	31	16.1	1	16	6.3

MINORITY WOMEN --December 1976 ^d						
	#MF	Total	%MF	#MF	Total	%MF
GS-13	0	11	0	0	11	0
GS-14	2	12	16.7	0	0	0
GS-15	0	8	0	0	5	0
Total	2	31	6.5	0	16	0

GRAND TOTAL (1973)

All GS 13-15 all regions	287
All women GS 13-15 in regions	30
All minority women GS 13-15	7
Percent of GS 13-15 who were women	10.5%
Percent of GS 13-15 who were minority women	2.4%

GRAND TOTAL (1976)

All GS 13-15 all regions	260
All women GS 13-15 in regions	24
All minority women GS 13-15	7
Percent of GS 13-15 who were women	9.2%
Percent of GS 13-15 who were minority female	2.7%

Total GS 13-15 work force in 1976 = 90.6% of 1973 force

Women GS 13-15 work force in 1976 = 80.0% of 1973 female force

^aFigures assembled by Office of Education, Federal Women's Program, May 1973.

^b*Ibid.*

^cData from the 31 December, 1976 report of Data Management Center, Computer Operations Division, Washington, D.C. and made available by HEW's EEO/FWP office, February 1977. No page numbers available.

^d*Ibid.*

EXHIBIT 9

CHANGE IN AVERAGE GRADE -- 1972 - 1976

	<u>HEW</u>	<u>OE</u>	<u>NIE</u>
<u>1972</u> Average Grade - Men	9.9 ^a	12.6 ^b	12.3 ^c
Average Grade - Women	6.0	7.6	7.8
Disparity	3.9	5.0	4.5
<u>1974</u> Average Grade - Men	9.8 ^d	12.1 ^e	13.1 ^f
Average Grade - Women	6.0	7.4	8.2
Disparity	3.8	4.7	4.9
<u>1976</u> Average Grade - Men	9.9 ^g	11.9 ^h	12.3 ⁱ
Average Grade - Women	6.4	7.4	7.5
Disparity	3.5	4.5	4.8

^aFederal Women's Program, Progress of Women in DHEW, May 1976, p.3.

^bIbid., p. 3.

^cIbid., p. 6. Figures are for July 1973, since NIE was not separate in 1972.

^dPersonnel Management Information and Reports Office, OPT, OS, Personnel Data Systems, December 1974, p. 64.

^eIbid., p. 50.

^fIbid., p. 53.

^gData Management Center, op. cit., December 1976, Report 104-113A data

^hIbid., Report 104-113A data, December 1976.

ⁱIbid., Report 104-113A data.

EXHIBIT 10

OFFICE OF EDUCATION: CHANGE IN AVERAGE GRADE
AUGUST 1975 -MARCH 1976^a

AUGUST 1975

	Total	Black	Hispanic	American Indian	Asian	Total Minority	Non- Minority
Average Grade - Men	12.1	10.3	12.8	11.8	13.1	10.6	12.7
Average Grade - Women	7.8	6.9	7.5	12.0	8.4	7.0	9.0
Disparity	4.3	3.4	5.3	.2	4.7	3.6	3.7

MARCH 1976

	Total	Black	Hispanic	American Indian	Asian	Total ^b Minority	Non- Minority
Average Grade - Men	11.8	9.8	12.4	13.0	11.8	10.1	12.4
Average Grade - Women	7.7	6.8	8.4	10.3	9.3	6.8	8.8
Disparity	4.1	3.0	4.0	2.7	2.5	3.3	3.6

^aOE-EEO, selected recent statistics being prepared for draft OE Affirmative Action Plan, 1977-78, Part C, p. 8.

^bDifferences in "Totals" shown for 1976 between Exhibits 9 and 10 are caused by differences in the dates of data collection. Exhibit 9 figures are based on December 1976 data and those in Exhibit 10 on March 1976 data (the most recent available with a breakdown by minorities).

EXHIBIT 11

CHANGE IN AVERAGE GRADE -- EDUCATION DIVISION
(ASE, OE, NIE)^a

	1972	1974	1976
Black Men	10.16	10.31	10.23
Black Women	6.30	6.60	6.71
Hispanic Men	12.06	11.95	12.19
Hispanic Women	7.15	6.48	7.92
American Indian Men	13.00	12.67	12.83
American Indian Women	9.00	10.00	9.25
Asian Men	11.78	12.33	11.14
Asian Women	7.75	7.38	6.69
Non minority Men	12.92	12.47	12.27
Non minority Women	8.46	8.18	8.11

^aHEW-EEO/FWP compilation, based on computer run of September 1972, September 1974, and September 1976.

EXHIBIT 12

COMPARATIVE NUMBERS OF EMPLOYEES OVER TIME

Education Division (OE, ASE, NIE)

	September 1974 ^a			1976 ^b		
	Men	Women	Total	Men	Women	Total
GS-13	298	117	415	301	121	422
GS-14	386	81	467	371	85	456
GS-15	265	28	293	233	32	265
GS-16	21	3	24	25	4	29
GS-17	11	2	13	12	2	14
GS-18	4	0	4	2	1	3

OE Regions and Headquarters

	December 1974 ^c			December 1976 ^b		
	Men	Women	Total	Men	Women	Total
GS-13	276	105	381	264	104	368
GS-14	358	72	430	313	71	384
GS-15	224	23	247	189	25	214
GS-16	24	3	27	24	3	27
GS-17	8	2	10	12	2	14
GS-18	2	0	2	1	0	1

N I E

	December 1974 ^c			December 1976 ^b		
	Men	Women	Total	Men	Women	Total
GS-13	19	13	32	17	5	22
GS-14	28	8	36	30	8	38
GS-15	25	4	29	18	4	22
GS-16	1	0	1	0	0	0
GS-17	0	0	0	0	0	0
GS-18	1	0	1	1	0	1

^aHEW-FWP compilation, September 1974 and September 1976.

^bData assembled from 31 December, 1976 report of Data Management Center, Computer Operations Division, Washington, D.C. and made available by HEW's EEO/FWP office, February 1977. No page numbers available.

^cPersonnel Management Information and Reports Office, OPT, OS, Personnel Data Systems, December 1974, p. 64.

EXHIBIT 13

NUMBER AND PERCENTAGE OF WOMEN IN HIGH GRADES -- BOAE -- MAY 30, 1976^a

	Deputy Commissioner			Executive Office			Planning Office			Consumer's Education			Community Education		
ALL WOMEN	# F	Total	% F	# F	Total	% F	# F	Total	% F	# F	Total	% F	# F	Total	% F
GS-13	0	0	0	0	1	0	2	2	100	0	0	0	0	0	0
GS-14	0	0	0	0	0	0	0	0	0	1	1	100	1	1	100
GS-15	0	1	0	0	1	0	0	1	0	0	1	0	0	1	0
GS-16	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
GS-17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
GS-18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	2	0	0	2	0	2	3	66.7	1	2	50.0	1	2	50.0
MINORITY WOMEN	# F	Total	% F	# F	Total	% F	# F	Total	% F	# F	Total	% F	# F	Total	% F
GS-13	0	0	0	0	1	0	0	2	0	0	0	0	0	0	0
GS-14	0	0	0	0	0	0	0	0	0	0	1	0	0	1	0
GS-15	0	1	0	0	1	0	0	1	0	0	1	0	0	1	0
GS-16	0	1	0	0	0	0	0	0	0	0	0	0	0	0	0
GS-17	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
GS-18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	2	0	0	2	0	0	3	0	0	2	0	0	2	0

^aOffice of Education, Bureau of Occupational and Adult Education, Affirmative Action Plan, 1977-78, December 1976, Appendix B.

EXHIBIT 13 (cont.)

	Metric Education			Assoc. Comm. for Adult, Vocational, Technical and Manpower Education			CETA Coordination			Adult Education			Research and Demonstration		
ALL WOMEN	# F	Total	% F	# F	Total	% F	# F	Total	% F	# F	Total	% F	# F	Total	% F
GS-13	1	1	100	0	0	0	0	0	0	1	3	33.3	2	3	66.7
GS-14	0	1	0	0	0	0	0	1	0	2	3	66.7	2	6	33.3
GS-15	0	0	0	0	1	0	1	1	100	0	1	0	0	1	0
GS-16	0	0	0	0	0	0	0	0	0	0	1	0	0	1	0
GS-17	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0
GS-18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	1	2	50	0	2	0	1	2	50.0	3	8	37.5	4	11	36.4

MINORITY WOMEN

	# F	Total	% F	# F	Total	% F	# F	Total	% F	# F	Total	% F	# F	Total	% F
GS-13	0	1	0	0	0	0	0	0	0	0	3	0	0	3	0
GS-14	0	1	0	0	0	0	0	1	0	0	3	0	0	6	0
GS-15	0	0	0	0	1	0	0	1	0	0	1	0	0	1	0
GS-16	0	0	0	0	0	0	0	0	0	0	1	0	0	1	0
GS-17	0	0	0	0	1	0	0	0	0	0	0	0	0	0	0
GS-18	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	2	0	0	2	0	0	2	0	0	8	0	0	11	0

Exhibit 13 (cont.)

EXHIBIT 13 (cont.)

	Division of Vocational and Technical Education			Educational Systems Development			Assoc. Comm. for Occupational Planning		
ALL WOMEN	# F	Total	% F	# F	Total	% F	# F	Total	% F
GS-13	2	3	66.7	0	1	0	0	0	0
GS-14	2	12	16.7	1	3	33.3	0	2	0
GS-15	0	3	0	0	5	0	1	3	33.3
GS-16	0	1	0	0	0	0	0	0	0
GS-17	0	0	0	0	0	0	0	0	0
GS-18	0	0	0	0	0	0	0	0	0
Total	4	19	21.1	1	9	11.1	1	5	20.0
MINORITY WOMEN	# F	Total	% F	# F	Total	% F	# F	Total	% F
GS-13	0	3	0	0	1	0	0	0	0
GS-14	0	12	0	0	3	0	0	2	0
GS-15	0	3	0	0	5	0	0	3	0
GS-16	0	1	0	0	0	0	0	0	0
GS-17	0	0	0	0	0	0	0	0	0
GS-18	0	0	0	0	0	0	0	0	0
Total	0	19	0	0	9	0	0	5	0

EXHIBIT 14

NUMBER AND PERCENTAGE OF WOMEN IN HIGH GRADES -- BPE -- JUNE 30, 1976^a
(GS-13 through GS-17)

	Office of Deputy Commissioner			Basic and State Student Grants			Eligibility and Agency Evaluation			Division of Institutional Development			International Education		
ALL WOMEN	#F	Total	%F	#F	Total	%F	#F	Total	%F	#F	Total	%F	#F	Total	%F
GS-13	1	6	16.7	2	5	40.0	0	1	0	3	5	60.0	2	7	28.6
GS-14	1	12	8.3	0	6	0	1	6	16.7	2	6	33.3	3	14	21.4
GS-15	1	4	25.0	0	2	0	0	1	0	1	3	33.3	0	8	0
GS-16	0	2	0	0	1	0	0	0	0	1	1	100	0	0	0
GS-17	1	4	25.0	0	0	0	0	0	0	0	0	0	0	0	0
Total	4	28	14.3	2	14	14.3	1	8	12.5	7	15	46.7	5	29	17.2
MINORITY WOMEN															
	#F	Total	%F	#F	Total	%F	#F	Total	%F	#F	Total	%F	#F	Total	%F
GS-13	0	6	0	0	5	0	0	1	0	2	5	40.0	0	7	0
GS-14	0	12	0	0	6	0	0	6	0	0	6	0	0	14	0
GS-15	1	4	25.0	0	2	0	0	1	0	1	3	33.3	0	8	0
GS-16	0	2	0	0	1	0	0	0	0	1	1	100	0	0	0
GS-17	0	4	0	0	0	0	0	0	0	0	0	0	0	0	0
Total	1	28	3.6	0	14	0	0	8	0	4	15	26.7	0	29	0

^aOffice of Education, Bureau of Post-Secondary Education, EEO Affirmative Action Plan October 1976 - September 1978, July 1976, pp. 19-56.

Note: % = percent of all races and sexes at that grade level. Thus % of Total is % of all races and sexes GS-13 to GS-17.

EXHIBIT 14 (Cont.)

	Student Financial Aid			Student Services and Veterans			Training and Facilities		
ALL WOMEN	#F	Total	%F	#F	Total	%F	#F	Total	%F
GS-13	2	4	50.0	3	5	60.0	0	5	0
GS-14	0	5	0	0	2	0	0	7	0
GS-15	0	2	0	0	1	0	0	3	0
GS-16	0	0	0	0	0	0	0	1	0
GS-17	0	0	0	0	0	0	0	0	0
Total	2	11	18.2	3	8	37.5	0	16	0

MINORITY WOMEN

	#F	Total	%F	#F	Total	%F	#F	Total	%F
GS-13	1	4	25.0	1	5	20.0	0	5	0
GS-14	0	5	0	0	2	0	0	7	0
GS-15	0	2	0	0	1	0	0	3	0
GS-16	0	0	0	0	0	0	0	1	0
GS-17	0	0	0	0	0	0	0	0	0
Total	1	11	9.0	1	8	12.5	0	16	0

EXHIBIT 15

Number and Percentage of Women in High Grades -- BESE -- June 1, 1976^a
(GS-13 and over)

	Office of Deputy Commissioner		Educational Technology		Environmental Education		State Assistance		Libraries and Learning Resources		EEO Program Operations	
	#	%	#	%	#	%	#	%	#	%	#	%
Total Employees GS-13 and over	26	100	10	100	3	100	18	100	17	100	15	100
Women	5	19.2	1	10.0	1	33.3	2	11.1	8	47.1	2	13.3
Minority Women	1	3.8	0	0	1	33.3	0	0	1	5.9	1	6.6

^aAffirmative Action Plan Bureau of Elementary and Secondary Education,
Fiscal Year 1977, pp. 20-31. Figures as of June 1976.

NOTE: % = percent of all races and sexes over GS-13.

	EEO Program Development		Supplementary Centers & Services		Follow- Through		Federally Affected Areas		Drug Education, Nutrition & Health		Education of the Disadvantaged	
	#	%	#	%	#	%	#	%	#	%	#	%
Total Employees GS-13 and over	3	100	14	100	10	100	8	100	7	100	32	100
Women	3	100	3	21.4	3	33.3	5	62.5	2	28.6	8	25.0
Minority Women	2	66.6	0	0	1	10.0	1	12.5	1	14.3	1	3.1

EXHIBIT 16

CHART ON NATIONAL ADVISORY COMMITTEES TO
THE EDUCATION DIVISION -- AS OF DECEMBER 1976

	Men	Women	% Women
<u>NIE^a</u>			
A. National Council on Educational Research	11	1	8.3%
<u>OE^b</u>			
B. Accreditation and Institutional Eligibility Advisory Committee	11	4	26.7%
C. Advisory Committee on the Education of Bilingual Children (about to be replaced)	3	5	62.5%
D. Advisory Council on Developing Institutions	7	2	22.2%
E. Advisory Council on Environmental Education	11	3	21.4%
F. Advisory Council on Financial Aid to Students	16	4	20.0%
G. Community Education Advisory Council	5	2	28.6%
H. National Advisory Committee on the Handicapped	8	7	46.7%
I. National Advisory Council for Career Education	6	2	25.0%
J. National Advisory Council on Adult Education	9	6	40.0%
K. National Advisory Council on Bilingual Education (replacing Advisory Committee on the Education of Bilingual Children)	7	7	50.0%
L. National Advisory Council on Education Professions (just disbanded)	5	5	50.0%
M. National Advisory Council on Equality of Educational Opportunity	8	6	42.9%

Exhibit 16 (cont.)

EXHIBIT 16 (cont.)

	% Women in 1975	% Minority Women	Permanent Size of Committee	Not Counted Because Resigned prior to December 1976	Not Counted Because Appointed Jan. - Feb. '77
A.	8.3%	unknown	15	0 (3 long-standing vacancies)	0
B.	40.0%	unknown	15 (but expand- able at pleasure of Commissioner)	0	0
C.	--	unknown	--	--	--
D.	22.2%	unknown	9	0	0 (3 to rotate 3/77)
E.	28.6%	unknown	21	4 men 3 women	4 men 3 women
F.	28.6%	unknown	21	1 man	1 man
G.	27.3%	unknown	11	3 men 1 woman	2 men 2 women
H.	40.0%	unknown	15	0	0
I.	33.3%	unknown	12	2 men 2 women	3 men 1 woman
J.	26.7%	unknown	15	0	0
K.	53.3%	unknown	15	0 (1 long-standing vacancy)	1 woman (+ 1 woman resigned in Jan.)
L.	46.7%	unknown	--	--	--
M.	38.5%	unknown	15	1 man	1 man

Exhibit 16 (cont.)

(EXHIBIT 16 -- ADVISORY COMMITTEES -- CONTINUED)

	Men	Women	% Women
(OE Continued)			
N. National Advisory Council on Ethnic Heritage Studies	7	3	30.0%
O. National Advisory Council on Extension and Continuing Education	13	5	27.8%
P. National Advisory Council on Indian Education	10	5	33.3%
Q. National Advisory Council on the Education of Disadvantaged Children	5	5	50.0%
R. National Advisory Council on Vocational Education	15	6	28.6%
S. National Advisory Council on Women's Educational Programs	3	17	85.0%
<u>ASE</u>			
T. National Advisory Council on Education Statistics ^d	8	2	20.0%
U. Board of Advisers to the Fund for the Improvement of Post Secondary Education	10	5	33.3%
GRAND TOTAL*	178	102	36.4%

^aInformation provided by NCER, March 1977.

^bAs of December 1976. Figures compiled for GSA by OE's Office of Committee Management.

^cBased on "Analysis of Membership and Staffing of OE Advisory Councils by Sex," prepared by OE Women's Program Staff, made available January 1977.

^dInformation provided by NCES, March 1977.

^eInformation provided by FIPSE, March 1977.

NOTE: Totals, excluding the National Advisory Council on Women's Educational Program are: males -- 175; females -- 85; % female -- 32.7%.

Exhibit 16 (cont.)

Exhibit 16 (cont.)

	% Women in 1975	% Minority Women	Permanent Size of Committee	Not Counted Because Resigned prior to Dec. 1976	Not Counted Because Appointed Jan.-Feb. '77
N.	33.3%	unknown	15	3 males 2 females	3 men 1 woman
O.	33.3%	unknown	18 (6 ex officio)	0	0
P.	46.7%	unknown	15	0	0
Q.	53.3%	unknown	15	3 males 2 females	4 men 1 woman
R.	14.3%	unknown	21	0	3 women 4 men 2 women retired 5 men retired
S.	80.0%		20 (3 ex officio)	0	0
T.	27.3%	unknown	11 (4 ex officio)	0	0 (1 vacancy)
U.	40.0	unknown	15	0	0

EXHIBIT 17

MEMBERSHIP OF STATE ADVISORY COUNCILS

ON VOCATIONAL EDUCATION

FISCAL YEAR 1977

	Total Number	Number Women	% Women
Alabama	40	4	10.1
Alaska ('76 data)	25	4	16.0
Arizona	23	5	21.7
Arkansas	24	4	16.7
California	22	3	13.6
Colorado	22	5	22.7
Connecticut	23	4	17.4
Delaware	30	6	20.0
District of Columbia	40	16	40.0
Florida	24	4	16.7
Georgia	21	3	14.3
Hawaii	16	1	6.3
Idaho	19	4	21.1
Illinois	28	6	21.4
Indiana	18	3	16.7
Iowa	13	4	30.8
Kansas	17	1	5.9
Kentucky	21	2	9.5
Louisiana	32	4	12.5
Maine	13	2	15.4
Maryland	25	4	16.0
Massachusetts	23	5	21.7
Michigan	23	5	21.7
Minnesota	25	6	24.0
Mississippi	15	1	6.7
Missouri	15	3	20.0
Montana	18	3	16.7
Nebraska	21	4	19.0
Nevada	13	2	15.4
New Hampshire	20	4	20.0
New Jersey	24	4	16.7
New Mexico	20	2	10.0
New York	30	9	30.0
North Carolina	17	5	29.4
North Dakota	25	4	16.0
Ohio	24	6	25.0
Oklahoma	30	7	23.3
Oregon	16	4	25.0
Pennsylvania	38	7	18.4
Rhode Island	20	4	20.0

(STATE ADVISORY COUNCILS -- CONTINUED)

	Total Number	Number Women	% Women
South Carolina	15	1	6.7
South Dakota	20	5	25.0
Tennessee	24	5	20.8
Texas	24	1	4.2
Utah	26	9	34.6
Vermont	32	8	25.0
Virginia	18	3	16.7
Washington	24	6	25.0
West Virginia	20	1	5.0
Wisconsin	19	5	26.3
Wyoming	18	3	16.7
American Samoa	11	3	27.2
Guam	16	7	43.8
Puerto Rico	21	6	28.6
Trust Territory	13	4	30.8
Virgin Islands	<u>14</u>	<u>6</u>	<u>42.9</u>
TOTALS	1228	247	20.1%

Source: National Advisory Council on Vocational Education, Summary State Advisory Councils on Vocational Education, December 1976.

EXHIBIT 18

TITLE IV, ESEA STATE ADVISORY COUNCILS
1976-77

State	Number Members	Number Women	Number not Identified by Sex
Alabama	12	5	0
Alaska	13	5	0
Arizona	14	8	1
Arkansas	12	2	0
California	18	7	0
Colorado	22	12	0
Connecticut	11	3	0
Delaware	12	3	0
District of Columbia	18	12	0
Florida	17	10	0
Georgia	14	6	3
Hawaii	22	14	1
Idaho	14	6	1
Illinois	18	9	0
Indiana	20	4	0
Iowa	15	7	0
Kansas	21	10	0
Kentucky	11	7	0
Louisiana	16	6	1
Maine	17	4	0
Maryland	22	8	0
Massachusetts	20	7	0
Michigan	28	11	1
Minnesota	20	9	0
Mississippi	17	6	0
Missouri	18	4	0
Montana	14	6	0
Nebraska	22	7	1
Nevada	15	8	0
New Hampshire	16	8	2
New Jersey	24	7	1
New Mexico	21	10	1
New York	17	8	0
North Carolina	21	8	2
North Dakota	11	4	0
Ohio	20	8	0
Oklahoma	12	3	1
Oregon	15	5	0
Pennsylvania	24	4	2
Rhode Island	20	13	0
South Carolina	15	5	2
South Dakota	15	6	1

(TITLE IV, ESEA STATE ADVISORY COUNCILS -- Contined)

State	Number Members	Number Women	Number not Identified by Sex
Tennessee	14	8	0
Texas	15	4	1
Utah	10	4	0
Vermont	22	14	0
Virginia	13	4	2
Washington	17	8	1
West Virginia	13	3	0
Wisconsin	17	5	0
Wyoming	9	4	0
American Samoa	11	4	7
Guam	15	10	0
Puerto Rico	15	7	2
Trust Territory	13	2	0
Virgin Islands	23	15	1
Total	931	386	35

Percent women on Title ESEA State Advisory Councils^a: 41.5%

^aThe 35 not identified by sex are not counted in this tally. Thus the tally is not exact.

SOURCE: Bureau of Elementary and Secondary Education, Fall 1976.

Appendix B

APPENDIX B

Follow-up of the 1972 Task Force Recommendations

We recommend that OE and NIE undertake to educate their own staffs and to avoid sex bias in agency operation and program management. Specifically, we recommend that:

- A. Briefings for all supervisory staff be conducted on the implications of Title IX and other sex discrimination legislation for OE's and NIE's program operations.

Formal response(s)

- a. OE (1973):
 - 1) OCR and EEO training/briefings to be held November 1973.
 - 2) Federal Women's Program explanation of Title IX to all managers and supervisors, to take place January-March 1974.
- b. NIE (1973):
 - 1) Ad Hoc Committee, appointed by Director, delineates responsibilities.

Actions undertaken by the above:

- a. OE
 - 1) "Agency-wide briefings" on Title VI and Title IX, fall 1973.
 - 2) FWP briefings of managers and supervisors, summer 1974.
- b. NIE:
 - 1) Circulates Ad Hoc Committee response.
- B. OE and NIE arrange for training programs to create employee awareness of sex biases and their influences on the actions of employees.

Formal response(s)

- a. OE (1973):
 - 1) There will be training for representatives from each unit, March-June 1974.
 - 2) There will be training for the regions in 1974.
 - 3) Trained representatives will go back and train their own units, summer and fall 1974.
- b. NIE

Actions undertaken by the above:

OE:

- 1) Training for male-female teams from each unit (32 hours initially, followed by 8 hours of follow-up). "Not well attended." (Forman, Four Years Later). Sessions held summer and fall of 1974.
- 2) 3 out of 10 regions trained, 1974 and early 1975.
- 3) Trained representatives return to train:
OPA: 100% in-depth training, fall 1974

BOAE: 90% trained, winter '74-75

Career Education Workshops for grantees and state coordinators, summer 1976

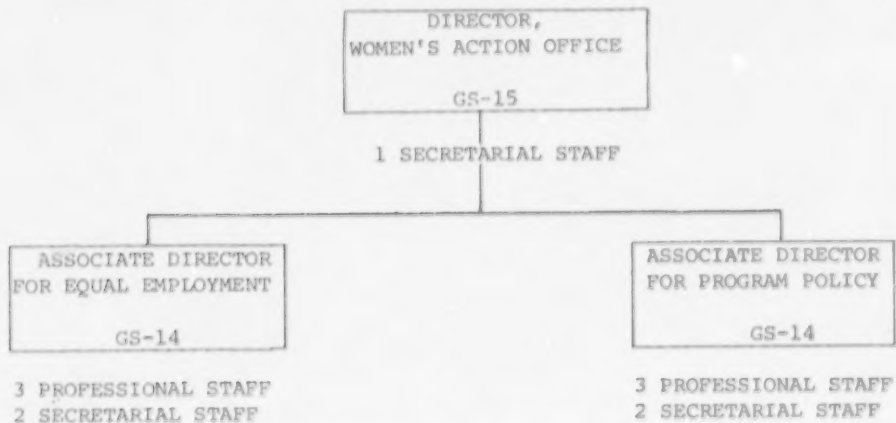
- 4) New Women's Program Staff began to identify materials for trainers, summer 1975.

b. NIE:

- 1) Conference on employment and affirmative action, fall 1974.
- 2) Agency-wide briefing on progress of implementation of Title IX, spring 1976.

We recommend that both OE and NIE establish a Women's Action office to see that steps to improve the status of women both inside and outside the agency are carried out smoothly and expeditiously. Specifically, we recommend that:

- A. These offices serve as a continuing source of advice to the commissioner and the director on progress towards that goal and on new steps needed to help women secure equality in education and in the federal education agencies.
- B. These offices report directly to the assistant commissioner for special concerns and an official of equivalent stature in NIE and absorb the functions of the Federal Women's Program coordinator.
- C. The following organization for the Women's Action Office be developed:



NIE would have a smaller staff consonant with the agency's present size.

FORMAL RESPONSE(S)

a. OE (1973):

- 1) Agree to set up the Women's Program Staff (staff of 5 rather than 14), 1973.

- b. NIE (1973):
 - 1) Agreed to appoint a Federal Women's Program Coordinator (1 person, half time), 1974

ACTIONS UNDERTAKEN BY THE ABOVE:

- a. OE:
 - Women's Program Staff office set up (staff of 2 only), Fall 1973, WPS:
 - a) trained cadre and developed training materials, 1974.
 - b) collected information, where possible on personnel trained in their own units and on bureau implementation of Task Force recommendations, 1974. (Only 5 out of 10 responses were received to WPS inquiry, and many indicated non-implementation).
 - c) added Women's Educational Equity Grants Program (3 staff added; total of 5), 1974.
 - d) increased to staff of 14, 1975-76.
 - e) contracted out Title IX technical assistance material development for dissemination, 1976.
 - f) collecting data on impact of education programs on women, 1976 ongoing.
- b. NIE:
 - Appointed FWP Coordinator (half-time) - 1974
 - FWP:
 - a) gathered data on women (in headquarters and on NIE-funded projects), 1974-75 and ongoing.
 - b) developed NIE Affirmative Action Plan (more comprehensive than previous one), 1975 for FY 1976.

We recommend that both OE and NIE convene an AD HOC committee by advertising for people interested in helping in the selection of the director and associate directors of the women's action offices. These AD HOC committees would be no more than 15 members, elected from among the original volunteers. These committees would draw up criteria for the selection of the director and the associate directors and identify and recommend candidates to fill those positions. Upon final selection of candidates by the OE commissioner and NIE director, the responsibilities of the AD HOC committees would terminate.

FORMAL RESPONSE(S)

- a. OE (1973):
 - Rejects this as "too cumbersome"

ACTIONS UNDERTAKEN BY THE ABOVE:

- a. OE:
 - 1) Women's Program Staff Director appointed by the Commissioner, Fall 1973
- b. NIE:
 - 1) FWP Coordinator appointed by the Director, 1974

We recommend that women's action advisors be designated throughout the agencies to link program policies and employees with the work of the Women's Action Office. Specifically, we recommend that:

- A. On a continuing basis, advisors work with the Women's Action Office in carrying out their mission throughout the agencies by recommending priorities for action. Reviewing program and employment activities affecting women and keeping communication channels open between program officials and the Women's Action Office.
- B. Advisors be designated by the directors of the respective women's action offices.
- C. Advisors be regular employees, released part-time from their regular duties.
- D. Each OE deputyship and equivalent in NIE have at least two advisors, one for internal employment and one for programs. OE should have one advisor concerned with employment for every 200 people in a deputyship, with the office of the commissioner combined with the deputyship for development. OE should have one advisor concerned with program policy for every 200 people in the three program deputyships and one advisor for the two staff deputyships. According to OE's current staffing, that would make a total of 24; NIE advisors would be chosen in a comparable manner.

FORMAL RESPONSE(S)

- a. OE (1973):
We will leave this up to the Women's Program Staff
- b. NIE
We will set up employment advisory committees (specifics to be announced)

ACTIONS UNDERTAKEN BY THE ABOVE:

OE:
Very weak communication between WPS and trained representatives.

We recommend that OE and NIE substantially increase the proportion of women advising on the operation of OE programs. Specifically, we recommend that:

All NIE and OE recommendations for advisory councils and special commissions aim to bring the proportion of women on each to 50 percent.

FORMAL RESPONSE(S)

OE (1973):
We will try to be 40% female, but not 50%. We will require 33%. We will send a memo requesting an increase to 50% for national advisory councils. Anything more than this is too rigid.

ACTIONS UNDERTAKEN BY THE ABOVE:

- a. OE:
National Advisory Councils 38.7% female, December 1976 (34.5% if NACWEP is excluded).
- b. NIE:
"Efforts being made." NIE's advisory body is 8.3% female, as of December 1976.

Appendix C

APPENDIX C

LIST OF PEOPLE INTERVIEWED

Key: USOE -- United States Office of Education
 NIE -- National Institute of Education
 DHEW -- Department of Health, Education and Welfare

Name	Position	Date of Interview
Kelly Acosta	Director, Postsecondary Programs Office of Bilingual Education USOE	2/8/77
Albert L. Alford	Assistant Commissioner, Office of Legislation USOE	10/5/76
Harold W. Arberg	Director, Arts and Humanities Staff USOE	10/8/76
Iris Bailey	Staff Assistant, Office of External Relations USOE	10/14/76
John Baird	Deputy Director, Right to Read USOE	10/8/76
Jack L. Billings	Acting Assistant Commissioner for Public Affairs Office of Public Affairs USOE	10/6/76
George Brown	Senior Statistician PVAB National Center for Educational Statistics DHEW	6/24/76
Thomas J. Burns	Associate Commissioner for State and Local Educational Programs USOE	10/14/76

<u>Name</u>	<u>Position</u>	<u>Date of Interview</u>
Lois-Ellin Datta	Assistant Director, Education and Work Group NIE	2/3/77
Harold Delaney	Associate Director, Education Equity Group NIE	8/9/76
Laura L. Dittmann	Education Specialist Office of Child Development DHEW	12/13/76
Joan E. Duval	Director Women's Program Staff USOE	10/7/76
John W. Evans	Deputy Commissioner, Office of Planning USOE	10/15/76
Herman R. Goldberg	Associate Commissioner for Equal Educational Opportunity Programs USOE	10/6/76
Lois E. Hartman	Director, Personnel and Training Division USOE	3/2/77
Dick Hays	Associate Commissioner, Director, Office of Libraries and Learning Resources USOE	10/26/76
S.W. Herrell	Associate Deputy Commissioner Bureau of Postsecondary Education USOE	10/13/76
Elam K. Hertzler	Ombudsman to State Education Agencies USOE	10/5/76
Kenneth Hoyt	Director, Office of Career Education USOE	10/15/76
Barbara Kemp	President AFGE Local 2607	2/13/77

<u>Name</u>	<u>Position</u>	<u>Date of Interview</u>
B. Ann Kleindienst	Director Office of Special Concerns DHEW	11/18/76
Jean Lipman-Blumen	Director, Women's Research Program NIE	12/6/76
Ann M. Martin	Associate Commissioner for Occupational Planning Bureau of Occupational and Adult Education USOE	2/22/77
Edwin W. Martin, Jr.	Deputy Commissioner, Bureau of Education for the Handicapped USOE	10/7/76
William E. McLaughlin	Assistant Commissioner, Regional Liaison USOE	10/5/76
John Meier	Director, Office of Child Development DHEW	12/13/76
Arthur Melmed	Head, Postsecondary Finance and Organization Programs Staff Finance and Productivity NIE	8/5/76
John C. Molina	Director Office of Bilingual Education USOE	10/8/76
S. Gabe Paxton, Jr.	Deputy Commissioner, Office of Indian Education USOE	10/7/76
Florence Perman	Director Federal Women's Program DHEW	11/23/76
James R. Robinson	Director (Acting), Head Start Bureau DHEW	12/13/76
John H. Rodriguez	Associate Commissioner for Compensatory Education Programs USOE	10/14/76

Name	Position	Date of Interview
Ernest Russell	Associate Director, Administration and Management NIE	8/9/76
Rebecca Schergens	Deputy Assistant Secretary for Education (Policy Communications) Office of the Assistant Secretary for Education	11/17/76
Michael Smith	Branch Chief, Data Requirements and Products NIE	8/6/76
William L. Smith	Director, Teacher Corps USOE	10/14/76
Leonard H. O. Spearman	Deputy Commissioner, Bureau of Postsecondary Education USOE	10/26/76
Thomas Stitch	Associate Director Basic Skills Group NIE	8/9/76
Leroy Walser	Director, Postsecondary Programs Division Office of Bilingual Education USOE	2/7/77
Robert R. Wheeler	Deputy Commissioner, Bureau of Elementary and Secondary Education USOE	10/14/76
Saul Yanofsky	School Capacity for Problem Solving NIE	8/6/76
Edward T. York, Jr.	Deputy Commissioner, Office of Management USOE	10/26/76

Appendix D

APPENDIX D

DOCUMENTS AVAILABLE FROM THE EDUCATION DIVISION

1. NIE-FWP Office -- available:

- a. Data by-grade-by-sex and by-grade-by-race only. Available for January, June, December 1975, January, December 1976. Percentages computed.
- b. A work-sheet showing number of slots (this is rare and good). Information on part-time staff, etc., for June 30, 1976. Charts show breakdown by-sex-by-race but not by individual GS level. (They show breakdown by GS 5-8, GS 9-11, GS 12-15.) (GS 12-15 is a strange way to break down the figures and makes the percentage of women in high positions look much more favorable than GS 13-15).
- c. Two sheets showing sex-by-race breakdown through December 1976 with no GS breakdown.
- d. NIE Statistics -- FY 1976. Average grade level for women and minorities from FY 1973-FY 1976.
- e. FY 1976 Affirmative Action Plan.

NIE -- Not available:

- a. No recent data by-grade-by-sex-by-race. (Data either leave out race, sex, or grade level.)
- b. No breakdown by group within NIE (all figures are agency-wide).

Note: There is no systematic collection of data on ASE and its components, except through computer run. OE-EEO is supposed to monitor ASE but has almost no data on ASE or components (such as NCES or FIPSE).

2. OE-FWP Office -- available:

- a. Figures by-grade-by-sex-by-race for OE regional offices May 1973.
- b. Figures by-grade-by-sex (no race) for OE, September 1973.
- c. Figures on accessions in OE regions January 1973-December 1974.
- d. Figures on women as percentages of promotions and accessions 1971-1972.
- e. Figures by-grade-by-sex-by-region for the various HEW agencies (+ percentage women) February 1973.

- f. Data on position titles of highest OE GS level office holders, upon request.

OE-FWP Office -- not available:

- a. Any figures more recent than 1974. (The Office has been closed down for a while and is not quick to assemble more up-to-date data.)
- b. No old affirmative action plans.

3. HEW-FWP Office -- available:

- a. Personnel Management Information and Reports Office, OPT, OS, U.S. Department of Health, Education and Welfare, December 1974, Personnel Data Systems: I. General Employment Statistics, Minority Employment Statistics, Personnel Actions.
- b. Charts showing comparisons of sex-by-race by GS level for the Education Division in 1972,* 1974, 1976. Percentages are also computed. (Figures on other components of HEW were available as well for purposes of comparison. These figures were based on September [1972, 1974, 1976] data.)
- c. Changes in Average Grades computed for Education Division by-sex-by-race 1972, 1974, 1976, as well as the amount of change of disparity 1972-76. Again, other Divisions of HEW were available for horizontal as well as vertical comparison. Again, September figures only -- nothing more recent.
- d. A number of FWP hand-outs on aspects of employment of women (see bibliography for complete list) which give some useful vertical and horizontal comparisons. However, there were some omissions, as noted below.

Information not available from HEW-FWP:

- a. Detailed recent comparisons by individual GS level in hand-outs. For example Accessions of Women in the DHEW May 1975-May 1976 was written:
- (1) to show only GS 13-15 and 16-18 percentages with no further breakdown.
- (2) in October 1976 on the basis of May 1976 data. As such it was not very useful to us. Same for Promotions of Women in HEW.
- b. There is an emphasis on average grade level which is not sufficiently explicit as to the factor besides the increase of

*1972 -- "Education Division" did not exist. Was compilation of OE and NIE.

women in top grades which can affect this figure. (For example, the creation of slots for a number of female secretaries could artificially depress an average grade level. Similarly, down-grading should be mentioned.)

c. No old affirmative action plans available.

4. HEW-EEO office -- available:

a. 31 December 1976 computer run: Data Management Center, Computer Operations Division, Washington, D.C., December 1976. Showing:

(1) Number of employees by-sex-by-race by GS level for HEW as a whole:

ASE
NIE
OE (regions and headquarters)
OE (region-by-region)

(2) Number of employees by-sex-by-race by occupational category.

(3) Average grade by-sex-by-race for HEW:

ASE
OE (headquarters and regions)
OE (region-by-region)
NIE

(4) Average grade by-sex-by (minority-non-minority) for HEW, ASE, OE (headquarters and regions) region-by-region. NIE.

(5) FY 1974 HEW Affirmative Action Plan

(6) FY 1976 HEW Affirmative Action Plan

Note: Computer runs are available on occupational categories, one per year (December); regions, four per year (March, June, September, December),; summaries, one per month.

Information not available from HEW-EEO:

a. OE headquarters alone (though numbers could be computed by adding all regions and subtracting from grand total headquarters and regions)

b. Breakdown on NCES

c. Breakdown on FIPSE

d. December information on Education Division as a whole (though numbers could be computed by adding OE, NIE and ASE)

e. FY 1975 Affirmative Action Plan (though available to read at HEW-EEO Office.)

5. OE-EEO Office -- available:

- a. A few charts of figures--most notably the HEW-FWP comparison by GS level, 1972, 1974, 1976 for the Education Division.
- b. Its own work sheets by-grade-by-sex-by race for OE headquarters. However, these were 3/30/76 figures and not useful to us for that reason.
- c. Charts of employment within the major Bureaus and some other offices, in most but not all cases broken down by-grade-by-sex-by-race. However, these were from the new Affirmative Action Plans submitted fall 1976 to OE-EEO for amalgamation into OE Affirmative Action Plan. As such the figures were based on June or July 1976, rather than anything more recent.
- d. Part of a draft for its new Affirmative Action Plan. Figures on increases, decreases, etc., are March 1976 or before.
- e. Its FY 1975 Affirmative Action Plan.